



**King County**

**KING COUNTY  
COMPREHENSIVE PLAN 2012  
Public Comments**

**March 1, 2012**

**King County Department of Development and Environmental Services  
900 Oakesdale Avenue Southwest  
Renton, WA 98057-5212**

**[http://www.kingcounty.gov/property/permits/codes/growth/CompPlan/2012\\_PublicReviewDraft.aspx](http://www.kingcounty.gov/property/permits/codes/growth/CompPlan/2012_PublicReviewDraft.aspx)**



# A

## Adcox, Howie and Joan, 33619 44<sup>th</sup> Place SE, Fall City, WA 98024

### Comments:

**First Request:** MAKE NO CHANGE to the Fall City Subarea Plan. Commercial Business zoning should not be enlarged until an alternative wastewater treatment system or public sewer is available. An alternative wastewater investigation should first be performed taking into consideration the size of the business district; with or without proposed rezones. Funding options should be explored and addressed. And it should be discerned whether the majority of the business district property owners support (are willing to pay for) the alternative wastewater or sewer project.

No sewer/wastewater in residential zone and no sewer tightline to Fall City.

Failing that, other requests:

**Request that the following language not be removed from L-4:** Future expansion of the business district is provided for in this Plan through potential Community Business zoning, which may be realized through an area-wide rezone initiated by the King County Council **once** alternative wastewater treatment systems or public sewers are available.

**Request that the following language not be removed from CP-937:** Potential commercial zoning adopted in the 1999 Fall City Subarea Plan may be actualized through an area-wide rezone initiated by the King County Council **once** alternative wastewater treatment systems or public sewers are available.

**Added language request to R-508, L-4, and CP-937:** Other than a failed septic system for an existing structure outside the downtown commercial district a tightlined sewer shall only serve the designated downtown commercial district.

**Reduction request for the Downtown Business District, Special District Overlay:** Reduce the amount of proposed commercial business rezoning and the size of the downtown business district; reducing special district overlay expansion and encroachment into existing residential areas. Commercial business zone should only be located on SR 202 and Preston-Fall City road. DO NOT rezone R-4 (P) located on 43<sup>rd</sup> Street (Cedar Street) to commercial business. Only tax lots 673070-0081, 673070-0075, 673070-0060, 673070-0275, 673070-0285, 673070-0305, and 673070-0315 located on the Preston-Fall City Road should be considered for commercial business rezoning at this time.

**Retained language request in Design Standards for New Construction Rural Business District, Special District Overlay:** Number of floors: 1 to 2 floors plus an optional basement.

**Retained language request in Design Special District Overlay, Permitted and Conditional Uses:** Residential: Multifamily residential units shall only be allowed on the upper floors of buildings.

**Added language request to Special District Overlay, Permitted and Conditional Uses:** Residential: Multifamily residential units shall be limited to 6 units per acre.

**Retained language requested:** No KCCP land use map amendments are recommended. There is no need for additional residential development capacity beyond what is already allowed in Fall City. The existing Fall City residential neighborhood should not be threatened by either expansion of Rural Town boundary for the purpose of more residential development, or by any commercial

### Response:

Disagree that all land use and zoning amendments should continue to be held until new wastewater system is in place. Health Dept review of on-site systems will protect the environment until a new system is in place.

Agree that there should be no sewer/wastewater alternative system for the residential area.

The intent of the subarea plan update is that a new wastewater system will only serve the designated downtown; current county code guides what to do in case of failed septic systems for existing development.

Comments about individual parcel zoning, height limits, and number of residential units are acknowledged.

Agree with comments.

“

“

There is no proposal to expand Rural Town boundaries

**Adcox, Howie and Joan, 33619 44<sup>th</sup> Place SE, Fall City, WA 98024 (Continued)**

Expansion beyond the boundary of the proposed SDO.

**Added language request to Special Recommendations for consideration and possible future action by King County: 328 signatures from Fall City Residents for Rural Preservation as public outreach for consideration and possible future action by King County as follows:**

- No sewer/wastewater in residential zone and no sewer tight line to Carnation, Snoqualmie, or King County Metro.
- Although a few small adjustments may be needed to the business district, there are several vacant business buildings in Fall City and therefore expansion/encroachment of the business district into existing residential areas will not improve business viability.
- Apartments, condos and townhouses are not consistent with rural town character and no new permits should be issued.

The existing town boundary should remain unchanged. No special rezoning should be granted using the King County Comprehensive Plan/Fall City Subarea Plan update as a means to sidestep the permit/hearing process.

The petition is part of the public record for the subarea plan, and can be accessed on the county web page.

These comments are acknowledged and have been considered during the planning process.

**Anderson, Christopher D., [Christopher.Anderson@dfw.wa.gov](mailto:Christopher.Anderson@dfw.wa.gov)**

The only major suggestion I have, and in line with what WDFW recommends overall [as well as directly referenced in WAC 365-190-130, 4(b)] to be incorporated into local policy and codification, is direct use and reliance on the WDFW Priority Habitats and Species program. The PHS program and listings provide the justification, based on best available science, of management consideration for species and habitats of local concern. I totally follow your thoughts on some of the current species that seem to be included with no real justification or complete understanding of why they are included – such as Douglas squirrel and a few others. I'm sure there may have been good reasoning for some of these species or habitats to be included previously, but with no background citation or reference to a science-based recommendation for management locally, it is tough to take them forward for inclusion in the Habitats and Species of Local Importance list. Using WDFW PHS listings for King Co. would help with this need of including species and habitats that are clearly justified based on best available science. See attached spreadsheet for specific Priority Habitats and Species that are found in King Co (under the King tab).

Besides the above, I included a few other comments that are somewhat related, more general thoughts for consideration, and one species (Western screech-owl) that may be appropriate to consider further for inclusion, if possible, and more justification (such as citation of WA and local trend data using BBS, CBC and other resources) is investigated and deemed appropriate for including this bird as a local species of importance. I think if these resources were analyzed for this species locally, we would find a downward trend in county populations and it may provide what is needed for inclusion at the King Co. level. I have concern for this species in urbanized landscapes within its range.

Because the Comprehensive Plan is a policy document for use by King County government, criteria were established to determine what King County's Species of Local Importance would be, and those criteria are intended to capture species over which King County government might impact or have an effect on. The list of PHS species has been reviewed, and some species have been newly added as a result.

Western Screech-owl is being added to the list of Species of Local Importance

**Anderson, Christopher D., [Christopher.Anderson@dfw.wa.gov](mailto:Christopher.Anderson@dfw.wa.gov) (Continued)**

Very impressed with the Biodiversity and Climate Change sections and associated language and integration into various Critical Areas sections for consideration and planning needs. It was very good to see inclusion of upland habitats in the Wetlands section (p. 4-83) since often wetland buffers and mitigation consideration miss the importance of these adjacent upland habitats to wetland wildlife and overall wetland habitat function and productivity.

Maybe consider adding the state WDFW Backyard Wildlife Sanctuary Program as a resource regarding other organizations that offer assistance/education/information regarding fish and wildlife habitat conservation (see second sentence of this section on p. 4-67).

Said that Habitats of Local Importance should include and specifically reference all WDFW recommended Priority Habitats for King County.

All WDFW Priority Species that are not already covered in above section E-418a (a) Fed/State Listed should be included and specifically referenced in this local imp. section. This would be all non-listed Priority Species that occur in King Co. E.g. Pileated Woodpecker, Western Toad, Trumpeter Swan, Tundra Swan, etc.

No change required.

Added language.

WDFW priority species are added that can be impacted by King County.

Western toad is covered in policy E-418g.

Common Loon should be added if we are including state listed species here. King Co. has most active occupied sites in entire state /county ...6 sites most recently. State Sensitive species; as is Peregrine, Bald Eagle. State Endangered N. Spotted Owl, Threatened Marbled Murrelet. Maybe these listed species not included as local species of importance since they are covered in above section as "Federal or State Listed Species"? Referring to all PHS occurrences in King County would assist in justifying this list overall since those are species/habitats recommended and justified for management consideration by WDFW based on current findings. Many of the species listed here currently do not seem to have a clear reasoning or justification for inclusion, as you mention as well (e.g. RT hawk, some of the species found here very irregular/rare since King is on edge of their state range, e.g. Cassin's finch, three-toed woodpecker, mountain chickadee. All occur rarely since King on edge of range in state but all would be very local, sporadic limited in occurrence to far east, higher altitude portion of the county.

Common loon is already protected as a Sensitive Species under policy E-418a.

Species listed here follow criteria spelled out in the introductory text to the policy. Species in the list that do not match criteria are being removed (including Three-toed woodpecker and Mountain chickadee). Red-tailed hawk is being taken off this list and put into its own policy

Would be good to consider Western screech-owl. WA breeding bird surveys indicate decline, particularly in urbanized areas. Overall common in WA, but places like King are seemingly seeing this species squeezed out of preferred habitat as it is developed/altered. Please consider addition.

Western screech-owl is being added to list.

I would recommend keeping Band-tailed Pigeons. We are, anecdotally, losing these from urbanized areas of King co. Their mineral congregation sites are vulnerable and considered a limiting habitat feature. We would want consideration of these sites if they are known or located on a site and proposed to alter or do away with them. Priority Species – regular concentrations and mineral sites.

Band-tailed pigeon will be retained on the list.

Mt. Goats on Mt. Si...largely DNR/USFS Jurisdiction but with potential for overlap in King Co open space/acquisitions? Due to exurban development/land use pressure worth keeping this on list to ensure consideration for e.g. travel corridors, separation from recreational conflict and other conflicting land uses, etc. Priority Species.

Mountain goats are being retained on the list.

| <b>Anderson, Christopher D., <a href="mailto:Christopher.Anderson@dfw.wa.gov">Christopher.Anderson@dfw.wa.gov</a> (Continued)</b>  |  |
|--|--|
| Include all PHS species for King. County   | Not all PHS species occur within King County's jurisdiction; those species are not included.   |
| Include all PHS species for King County. Western Toad should definitely be here.   | Western toad is a Candidate species and therefore covered under policy E-418g.   |
| Include all PHS species for King. Great to include Western Fence lizard – not enough local data on them but definitely rare and should have consideration where found or currently/past known; particularly in our shoreline areas.  | WDFW priority species are added that can be impacted by King County.   |
| Include all PHS species and habitats for King County.  | WDFW priority species are added that can be impacted by King County.<br><br>All habitats occurring in King County will be included – and if they are not included in the 2012 update (e.g., Biodiversity corridors), they will be considered in future updates.  |
| <b>Anderson, Larry and Lynn, 4354 334<sup>th</sup> Place SE, Fall City, WA 98024</b>   |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above   | See response to Adcox - above  |
| <b>Anderson, Patrick, City Attorney, Snoqualmie, P.O. Box 987, Snoqualmie, WA 98065</b>  |  |
| <p>Page 1-6, Change the work “line” in the first sentence of policy RP-107 to “boundaries.”</p> <p>Page 1-9, Change the text top of page 1-9, last full sentence of section, by adding “provided, the County is required by GMA to ensure that each city within the county includes areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail and other nonresidential uses.”</p> <p>Page 2-2, Do a global find on “Rural City” and replace with “City in the Rural area.”</p> <p>U-107, page 2-5, Add the following to policy U-107; “provided, urban growth shall be encouraged in all Urban Growth Areas consistent with the mandate of RCW 36.70A.110.”</p> <p>Table DP-1 Page 2-10, Snoqualmie should be moved from the list of “Small Cities” to the list of “Larger cities.”</p> <p>RU-203 Page 3-10, Add the following to this policy: “except as required to comply with the requirements of RCW 36.70A.110(2) for cities in the Rural Area.”</p> <p>Page 3-40 Remove referenced to “Rural Cities” from this section and all of Chapter 3.</p> <p>C. Rural Cities, Page 3-44, Move this section to Chapter 2, Urban Communities.</p> <p>R-510 Page 3-45, Change “rural city” to “City in the Rural Area.”</p> | <p>Correction will be made.</p> <p>Comment acknowledged. Direct citations of the RCW are not necessary in the comprehensive plan policies and text.</p> <p>This suggestion is not necessary.</p> <p>Comment acknowledged. Direct citations of the RCW are not necessary.</p> <p>Suggestion is not consistent with Vision 2040.</p> <p>Comment acknowledged. Direct citations of the RCW are not necessary.</p> <p>Comment acknowledged and not concurred with.</p> <p>Comment acknowledged and not concurred with.</p> |

| <b>Anderson, Patrick, City Attorney, Snoqualmie, P.O. Box 987, Snoqualmie, WA 98065 (Continued)</b>   |   |
|---|---|
| A, Introduction Page 7-3, the second bullet should be revised to focus on providing adequate public transportation service to the urban Growth Area, including Cities in the Rural area.  | Disagree  |
| C, Public Transportation System Page 7-21, Include reference to Cities in the Rural area in the first sentence of first paragraph.  | Disagree  |
| A, Consistency with Plans Page 9-1, Delete statement the Countywide Planning Policies were "adopted in 2011." The CPPs were recommended to King County council by GMPC on September 21, 2011."  | Correction will be made.  |
| ED-101a, page 9-6, change "urban growth management area boundary" to "Urban Growth Area".   | Correction will be made.  |
| Page 9-20 and following, Remove all references ort implications in this section that Cities in the Rural Area are part of the sphere of influence King County policies for the Rural Area, which is limited to the unincorporated Rural Area. | Disagree. See page 24 of Vision 2040 for a discussion of small cities surrounded by Rural Areas.  |
| IX. Snoqualmie, King County Staff should conduct a thorough review of these policies to eliminate those policies calling for action that have already been accomplished.  | Good point, but there is not sufficient staff resources to do a thorough review of all of the community plan policies carried forward as Chapter 10 of the comprehensive plan at this time. |

# B

| <b>Barfuse, Ulis, P.O. Box 514 (5016 325<sup>th</sup> Place SE), Fall City, WA 98024</b>   |  |
|--|--|
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above   | See response to Adcox - above  |
| <b>Baugh, Dave, P.O. Box 58792, Tukwila, WA 98138</b>  |  |
| Encourages King County to join with the City of Covington to study future land use in the area known as the "Covington Notch".   | The Covington Notch land use study is not part of the scope of work for the 2012 update of the King County Comprehensive Plan. |
| <b>Bethards, Marvin and Beverly, 4426 331 Avenue SE, Fall City, WA 98024</b>   |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above   | See response to Adcox - above  |
| <b>Bethell, Steve, 4361 338<sup>th</sup> Place SE, Fall City, WA 98024</b>   |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above   | See response to Adcox - above  |
| <b>Bilbro, Tom, 35831 SE 27<sup>th</sup> Place, Fall City, WA 98024</b>  |  |
| Expressed strong support for exploring sewer options for Fall City without providing sewers to the entire Fall City community; and some support for the areas proposed to be added for commercial use. | Comments about the Fall City subarea plan are acknowledged.  |



|  |   |
|--|---|
| <b>Bina, Linda, P.O. Box 1045, Snoqualmie, WA 98065</b>  |   |
| Supports the commercial zoning for properties behind the commercial property fronting SR-202 in Fall City.   | Comment acknowledged.   |
| <b>Bradley, Michael O., Sound Design and Consulting, <a href="mailto:michaelvsh@aol.com">michaelvsh@aol.com</a></b>  |   |
| <p>Instead of adding more regulations, the county should put an effort into the scuttling of existing codes and policies that are antiquated, no longer relevant, and in general, a burden on the citizens of unincorporated King County. Examples of outdated or burdensome regulations include: minimum lot size for accessory dwelling units, inconsistencies between the zoning code and health code about what constitutes a kitchen, the 2009 Surface Water Design Manual, limitations on bulkheads.</p> | <p>King County agrees that it is important to review existing regulations to make sure that they continue to serve the purpose for which they were adopted. Over the past several years, DDES has proposed annual revisions to development regulations designed to eliminate provisions that are no longer necessary or that are not achieving their objectives. However, regulations, such as stormwater regulations, bulkhead standards, and density limits, serve important public purposes.</p>   |
| <b>Bratton, Nicholas, Project Manager <a href="mailto:nbratton@forterra.org">nbratton@forterra.org</a></b>   |   |
| The clarifications to R-319 are a positive step forward.   | Comment acknowledged.   |
| <p>Policy R-320 states that the goals include reducing rural and resource development potential, increasing activity in the TDR market, and bolstering demand for TDR.</p> <p>We believe TDR is most effective when tied to drivers of growth – in both the urban and rural environment. While existing policies allow limited rural zone applications, greater opportunity exists. Connecting TDR to all allowable, approved rural growth would advance all the R-320 goals noted above.</p>                  | <p>KC TDR program allows limited rural to rural transfers to actualize RA-2.5 zoning in the RA-2.5 rural zone.</p> <p>KC's priority and focus is to transfer density into its Urban Growth Area – both cities and unincorporated UGA.</p> <p>Before expanding rural to rural transfers, beyond what is currently available in policy and code, we want to fully actualize the full potential and our primary goal of rural-to-urban transfers of development rights.</p> <p>Expanding rural-to-rural TDR before we have accomplished this is not in line with the county's growth management policies and TDR goals R-312 and 313.</p> <p>Per policy R-304, the county has not up-zoned a rural property to greater rural-zoned density; it would be a contradiction to R-304 to make TDR a means to do so.</p> |



| <b>Brathovde, Michael –Friends of Rock Creek</b>  |  |
|---|--|
| <p>The Friends of Rock Creek Valley strongly support the Staff Recommendation to replace the existing Mining (M) zoning on the 322 acres of Reserve Silica property with a Forest land use designation and Forest (F) zoning, and to include this land within the Forest Production District. We adamantly oppose the proposal submitted by R.W. Thorpe &amp; Associates to redesignate the 322 acres as Rural Residential land use with an RA-10 rezone.</p>   | <p>Comments in support of the staff recommendation for the Reserve Silica area zoning request are acknowledged.</p>    |
| <b>Brand, Jessica, King County Conservation Voters, <a href="http://wcvoters.org/counties/king!">wcvoters.org/counties/king!</a></b>  |  |
| <p>I am writing today in opposition to the adoption by the King County Council to move as part of the comprehensive plan updates the incorporation of the areas studied in the Sammamish Valley Area Comprehensive Plan Designation and Zoning Study, motion 13475.</p> <p>In 2011 King County Conservation Voters launched the King County Common Environmental Agenda and named the loss of farmland in King County and in particular this vote as on of our top priorities for the local environmental community.</p> <p>The King County Common Environmental Agenda builds off of the successful state model of the Environmental Priorities Coalition but focuses our efforts locally in King County. This Common Agenda will provide elected officials with a clear voice of our King County environmental priorities and will also provide to environmental voters a clear view of our elected champions.</p> <p>We oppose the motion to move any part of the current Agricultural Production District (APD) into the Urban Growth Area. The APD is critical to the overall quality of life in King County and adds local healthy food production to our community and acts as an important buffer to other low density development and forest lands.</p> <p>As noted in the Executive's recommendation, this proposal falls far short of the requirements that must be met to change the County's Urban Growth Boundary. This proposal is inconsistent with the Growth Management Act, the King County Wide Planning Policies and the King County Comprehensive Plan.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |

C

| <b>Carpenter, Tom, <a href="mailto:TDCarp@comcast.net">TDCarp@comcast.net</a>. 15006 SE 139<sup>th</sup> Place, Renton, WA 98059</b> |  |
|--|--|
| Support comments submitted by CARE   | All of CARE's comments have been thoroughly reviewed and responded to above. |
| Suspend the TDR program until it can be fully reviewed.  | The TDR program has been thoroughly reviewed and it will not be suspended    |

**Carpenter, Tom, [TDCarp@comcast.net](mailto:TDCarp@comcast.net). 15006 SE 139<sup>th</sup> Place, Renton, WA 98059  
(Continued)**

|  |  |
|--|--|
| <p>Conduct a full program management review. Clarify responsibilities, accountabilities, and authorities of the whole TDR program.</p>                     | <p>The TDR program has been thoroughly reviewed.</p> <p>A good source of information regarding what the TDR program has done over the last 10 years, and where TDRs have come from, the lands protected, and where TDRs have been used or transferred into, can be found on the TDR program website<br/> <a href="http://www.kingcounty.gov/tdr">http://www.kingcounty.gov/tdr</a></p> <p>In addition, the TDR website features an online and interactive map that provides all the information related to TDR receiving and sending sites. This can be found here:<br/> <a href="http://www.kingcounty.gov/environment/stewardship/sustainable-building/transfer-development-rights/tdr-map-viewer.aspx">http://www.kingcounty.gov/environment/stewardship/sustainable-building/transfer-development-rights/tdr-map-viewer.aspx</a></p> |
| <p>Analyze and respond to all issues identified with the TDR program before allowing further TDR purchases or sales.</p>                                   | <p>The TDR program will not be suspended</p>   |
| <p>Increased density of any kind is not allowed in areas where factors (walkability, proximity to rural or TNR points, etc.) do not favor the density.</p> | <p>TDR is one option for builders to increase their project development capacity by a set amount as established by KC's zoning code. That is, zoning sets a minimum density and a maximum density. Set maximum density is achievable through a menu of residential density incentive options, TDR being but one. TDR does <b>not</b> allow increases in density above the maximum set in zoning code.</p>  |

**Carpenter, Tom, [TDCarp@comcast.net](mailto:TDCarp@comcast.net). 15006 SE 139<sup>th</sup> Place, Renton, WA 98059  
(Continued)**

Increased density is not desired anywhere near the rural area due to the high potential of spreading the urge to urbanize into the rural area.

Increased density is desired in the County's Urban Growth Areas (UGA), some areas of which are in close proximity to the UGA boundary.

Receiving site TDR transactions are only allowed in urban unincorporated areas where there is an ILA between the PAA city and the county. Along with amenity planning and funding, the ILA addresses all the items specified in MPPs in Vision 2040.

Encouraging development inside the County's designated UGA is much preferable to development outside the UGA (i.e. in the county's rural areas); TDR is a policy tool used by the county to achieve this growth management outcome.

The county is committed to maintain the application of TDR in its unincorporated urban areas/PAA's; but do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.

In this context the county will amend the currently proposed policies to reflect: (1) the need to develop, with cities, design guidelines for their respective PAA's; and (2) use of TDR amenity funds in urban unincorporated areas/PAA's after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.

**Carpenter, Tom, [TDCarp@comcast.net](mailto:TDCarp@comcast.net). 15006 SE 139<sup>th</sup> Place, Renton, WA 98059**  
**(Continued)**

|  |  |
|--|--|
| Correct amenity funding as needed in existing or pipeline TDR receiving sites.   | Will amend the currently proposed policies to reflect use of TDR amenity funds in urban unincorporated areas/PAA's after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.       |
| Based on the TDR receiving site experience thus far along with local resident experience, create, enhance and/or implement policies and codes that favor desirable and prevent undesirable conditions when allowing TDRs to be used. | Will amend the currently proposed policies to reflect the need to develop, with cities, design guidelines for their respective PAA's   |
| County and city jurisdictions should be fully accountable for impacts to other jurisdiction's concurrency, including transportation concurrency.   | King County does not have the authority to deny developments within other jurisdictional boundaries based on transportation concurrency. The County concurrency testing does take into account other jurisdiction traffic on County roads, which can lead to concurrency failure in the unincorporated area. |

**Callow, Jim, [Jimnlaura@comcast.net](mailto:Jimnlaura@comcast.net)**

|  |   |
|--|---|
| <p>Comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above.</p> <p>Rewrite R-652 to allow farms to have heavy recreational use if they want to. Cites Remlingers as an example of what should be allowed</p> <p>R-102 Recommended change: I believe you should mention Community Service Areas (CSA) and that they encompass a vast diversity of citizens and groups. Rationale: UAC's are no longer under contract to the King County and all voices are equal.</p> <p>Page 3-6 and 3-7 States:<br/> <u>As the county recognizes a profound difference between the nature and character of unincorporated rural King County as compared to the urban areas,</u><br/>         ((1))it is the intent of the county to continue to provide services at established rural levels ((and support the rural economic cluster businesses)) that support and help maintain rural character.</p> | <p>See response to Adcox – above</p> <p>Under current policies and codes, farmers are allowed to have a range of agro-tourism activities. Policy prohibits "active recreational facilities". As defined, active recreation requires developed area for organized or intense recreation. We maintain that is not appropriate use for APD land.</p> <p>Revise this policy to add in that the County will work with the organizations within each of the identified Community Service Areas.</p> |
|--|---|

**Callow, Jim, [Jimnlaura@comcast.net](mailto:Jimnlaura@comcast.net)**

Question: Just what is the defined "intent of the county to continue to provide services at established rural levels" ? Is there a look up table of these services? I know the other chapters try to address it but sometimes services are decreased or could possibly be increased to make what a newly designated rural town needs or for making incorporation more attractive.

Recommendation: Strike that sentence. Rationale: You can not define (nor want to) services at established rural levels. They should be tailored to meet the essential service needs of an area. The language puts the County in a box to perform.

Page 3-10 States: R-203

Recommendation: Strike the sentence. Rationale: The designation can and will change as rural areas are requested for incorporation into cities. Do not use the KCCP to put teeth in something King County government wishes to see (incorporation) happen.

It is important that the County recognize in policy, rather than only in specific codes and regulations that there is a different level of service appropriate to rural areas. An example will be added to the policy. As an example, street and sidewalk improvements requirements will be different in the rural area, in urban areas sidewalks adjacent to commercial or residential streets are necessary for safe pedestrian access to nearby schools and shopping.

**Chan, Venlin Joseph, [venlinjosephchan@yahoo.com](mailto:venlinjosephchan@yahoo.com)**

I was very disappointed at the newly published draft. Everything was changing continuously. However, King County Comprehensive Plan still sang the old song about rural areas titled " Rural Legacy and Rural Protection" for more than a couple decades. My actual experience was rural depriving and rural restrictions for the past ten years.

The growth boundary was old, unnatural, requiring modifications. The transportation policies were unfair, confusion, and requiring changes.

The transportation policy of " No road capacity increase in rural areas" was unfair to rural residents;  
The traffic concurrency was confusion and unfair to rural landowners; was an added land use restriction on top of the rural zoning land use restrictions.

These comments have been thoroughly considered and found to be inconsistent with the long-standing rural land use designation for the Sammamish Valley and the transportation policies for roads in the Rural Area.

| <b>Chan, Venlin Joseph, <a href="mailto:venlinjosephchan@yahoo.com">venlinjosephchan@yahoo.com</a> (Continued)</b>  |  |
|---|--|
| <p>The traffic concurrency should be applied as a measure of road work efficiency for the transportation department and as a tool for prioritizing road capacity improvement projects. It is the responsibility of the county government, the transportation department, to maintain road capacity improvement ensuring fulfillment of traffic concurrency of area developments within the area zoning limits.</p> <p>The growth boundary should be expanded to cover rural areas where the rural characters were lost already like the place I live now. The boundary should be coinciding with the natural boundary like the line of the foothills.</p> |  |
| The transportation policies were unfair and confusing.  | Comment noted. We have made every effort in this update to clarify the transportation policies and communicate technical transportation issues as simply as possible.  |
| The transportation policy of no road capacity increase in rural areas is unfair to rural residents  | Comment noted. These policies are consistent with the Growth Management Act, as well as the regional plan Transportation 2040 and the Countywide Planning policies.  |
| Transportation concurrency is confusing and unfair to rural landowners and is an added land use restriction on top of the rural zoning land use restrictions.   | Comment noted. Transportation concurrency is required by the Growth Management Act.  |
| <p>The traffic concurrency should be applied as a measure of road work efficiency for the transportation department and as a tool for prioritizing road capacity improvement projects. It is the responsibility of the county government, the transportation department, to maintain road capacity improvement ensuring fulfillment of traffic concurrency of area developments within the area zoning limits.</p>  | <p>Transportation concurrency is one of the factors considered when planning and prioritizing road capacity improvements. However, the approved Strategic Plan for Road Services lays out the priority for funding projects in the Roads CIP in the following order:</p> <ol style="list-style-type: none"> <li>1. Regulatory compliance</li> <li>2. Core safety</li> <li>3. Preservation of existing facilities</li> <li>4. Mobility improvements</li> <li>5. Capacity improvements</li> </ol> <p>Due to severe funding challenges, King County is currently unable to fund new capacity projects and is focusing on the first three priorities listed above.</p> |
| <b>Calvin, Thomas L and Patricia, 4335 328<sup>th</sup> Place SE, Fall City, WA 98024</b>   |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above  | See response to Adcox - above  |

|   |  |
|---|--|
| <b>Cerven, Laura, 21532 84<sup>th</sup> Avenue SW, Vashon, WA 98070</b>   |  |
| Supports preservation of natural habitat, zoning restrictions that slow growth, and educational opportunities that offer practical conservation ideas and process familiarity that makes it easy for people to make changes to improve the quality of life for everyone. Also supports acquisition and development of new public lands for trail use and passive recreation.  | Comments acknowledged.   |
| <b>Chaney, John, 31425 SR Issaquah-Fall City Road, Fall City, WA 98024-6508</b>   |  |
| <p>Chapter 1 Regional Planning: expand RP-101 to include “protection of significant cultural and historic resources.”</p> <p>Policy U-207i in the Urban Chapter and CP-304 in the Enumclaw section of the Community Plan Chapter advocate, but do not require, protection for landmarks that are no longer under KC governance due to transfer or annexation. Protection of KC landmarks should be mandatory</p> <p>Chapter 3, R-101 add text to support policy revisions</p> <p>Chapter 6, P-202a support change but don’t understand why language on collaboration was stricken</p> <p>Chapter 9, ED-201h Replace “historic building facades” with “historic structures, districts, and landscapes” and replace “pursue historic business district revitalization plans” with “preserve and enhance historic business districts including revitalization projects.”</p> | <p>Will revise policy RP 101 to reflect suggestion.</p> <p>The time of annexation or transfer or property is not the time to be requiring protection of KC landmarks. The protection should be assured through approval of ILAs prior to any change in governance.</p> <p>The supporting text does discuss aspects of policy R-101, County staff will review to determine if additional information should be added.</p> <p>Comment noted.</p> <p>Will revise policy to reflect suggestions.</p> |
| <b>Chaney, John, 31425 SR Issaquah-Fall City Road, Fall City, WA 98024-6508 (Continued)</b>   |  |
| <p>Chapter 9, Rural Economic Development Add text to expand tourism to include “landmarks, historic districts, museums, and other cultural tourism opportunities” ; replace “recreation and tourism” with “recreational and cultural tourism”; and add “... and historic properties and cultural resources...” after working farms and forests.</p> <p>Chapter 10, Community Plans – CP-304</p> <p>Chapter 11, Implementation - I-501e – expand incentives, including TDR programs to support historic preservation.</p>  | <p>Will revise text to reflect suggestions.</p> <p>Comment noted.</p> <p>Comment noted.</p>  |
| <b>Crittenden, Karen, No address noted, peacefulchild@me.com</b>  |  |
| Would like to see hair salons and barber shops allowed within the Fall City business district.  | These uses are proposed to be allowed in the Fall City business district.  |
| <b>Cox, Adrienne [iterainc@comcast.net]</b>   |  |
| Opposes the proposal to move the urban Growth Boundary in the Sammamish Valley.   | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area  |



**Chang, Echo, [echo\\_chang@yahoo.com](mailto:echo_chang@yahoo.com)**

I am opposing the proposal to move the Urban Growth Boundary, which will affects the Sammamish Valley and change the character of the place I love and call home.

The farmlands and rural character of the Sammamish Valley promotes a sense of place that is valuable to our community. Long term protection of the character of our community, on both the Urban and the Rural side of the line, is enhanced by keeping the Urban Growth Boundary where it is.

Furthermore, the quality of the development of our community and the willingness of people to invest their time and money in various enterprises are enhanced by having stable boundaries and consistent policies that we can depend on. I urge you to keep the Urban Growth Boundary as it is.

Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area

D

**Dawson, Susan, 17855 W. Spring Lake Drive SE, Renton, WA 98058**

In **Chapter 4—Environment** the importance of dealing with Climate Change is strongly emphasized, while preserving fish and wildlife has been de-emphasized.

The Growth Management Act was passed in 1990, almost 22 years ago, requiring that critical areas such as fish and wildlife habitat conservation areas be designated and protected. Yet **E-418d** says these areas *should be* identified. Why hasn't this task been completed by now?

Two separate wildlife-related sections (Fish and Wildlife and Biodiversity) have been combined into one unified section, but no content has been lost and some has been enhanced. Additionally, several climate change policies have been added that directly address the impacts of climate on wildlife and biodiversity.

**Dawson, Susan, 17855 W. Spring Lake Drive SE, Renton, WA 98058**

418d is a new policy that reflects the latest guidance from WDFW. That "seasonal ranges and habitat elements where federal and state listed endangered, threatened and sensitive species have a primary association" should be mapped is a new set of guidance since the last Comp Plan update in 2008. Federal and state-listed threatened, endangered and sensitive species are one set of Fish and Wildlife Habitat Conservation Areas (FWHCAs), as listed in 418a. Note that FWHCAs are named as one set of Critical Areas in policy E-107. Critical Areas are mandated to be established under the Growth Management Act (GMA), and these policies are in line with the GMA. Our Critical Areas Ordinance (CAO), which went into effect in 2003, does protect critical areas including FWHCAs. It is within the CAO where the rubber meets the road and protection of habitat is codified; and it is in there. What this means is that even though we do not have maps of all habitats in the County, per se, when someone goes to develop their property, the property must be inspected for the presence of any critical area, including FWHCAs, and protection of any FWHCAs found on the property is then established by following the code (21A.24.382).

| <b>Dawson, Susan, 17855 W. Spring Lake Drive SE, Renton, WA 98058 (Continued)</b>  |   |
|--|---|
| <p>Bears, cougars and bobcats are among the species left off the species of Local Importance list (<b>E-418e</b>) as are numerous bird species. It makes more sense to preserve these species now before their genetic diversity is reduced due to the fact that there are so few individuals remaining.</p> <p>Although <b>Chapter 4 Environment</b> directs King County to protect the environment and habitats for wildlife, in actuality, Special Use and Conditional Use Permits allow development to take precedence over preserving the environment. An example of this is the issue of permitting schools for urban residents to be built in the rural area.</p> <p>And, despite the need for trees to counteract Climate Change, development continues unabated as more land is incorporated into cities. It is not surprising then that habitats are continuing to decline. This does not bode well for wildlife in King County.</p> | <p>Black bears, cougars, and bobcats are all three abundant species in King County with stable populations.</p> <p>Comment acknowledged.</p> <p>All lands inside the Urban Growth Area boundary will most likely be incorporated at some point; that is why the UGA is zoned urban. The idea behind having a UGA is to intentionally concentrate development so that other areas (outside the UGA) remain rural and not inconsequentially retain wildlife habitat and forest.</p> |
| <b>Deatry, Louis E. and JoAnn, P.O. Box 114, Fall City, WA 98024</b>   |   |
| <p>All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above</p>  | <p>See response to Adcox - above</p>  |

**Dearborn, Keith, [kdearborn@dearbornmoss.com](mailto:kdearborn@dearbornmoss.com)**

The Public Review draft states two reasons for not accepting RS's request to classify the mining site in the RA-10 zone. First, that residential uses may lead to complaints about adjacent forest activities. Second, the residential development may bring pressure to rezone other resource-designated properties. We do not believe either of these reasons are supported by the facts.

In its more than 100 years of use, the mine site has never been used for commercial forestry and is not in a forest tax classification. Further, portions of the mining site are being remediated and cannot be used for forestry. Only about 40% of the site has vegetation and this area does not qualify under the GMA as forest land of long term commercial significance.

Three property owners abut the RS mining site. The two properties west of the RS mining site are classified in the Forest Zone. However, neither qualify for this zoning classification using the criteria set forth in the 1985 Comprehensive Plan. Both western property owners are joining in the RS request for RA-10 zoning. All of the lands that abut the east, northeast and south boundaries of the RS mining site are included in a conservation easement with the City of Black Diamond. Thus, use of these parcels as well as 23 additional parcels east of the RS mining site are permanently restricted to forestry. Therefore, classifying the RS mining site RA-10 will not lead to a change in the Forest Zone classification for these properties.

Regarding potential complaints, the GMA requires adjacent residential property owners to consent to resource use activities. Legally they cannot object to any lawful resource use of the properties adjacent to the RS mining site. Further, all three adjacent property owners have reviewed the proposed site plan for the RS Parcels and expressed no concern about compatibility.

Comments acknowledged.

| <b>Divers, Terri, 33220 SE 44<sup>th</sup> Place, Fall City, WA 98024</b>   |  |
|---|--|
| <p>Sent a series of emails about the Fall City subarea plan. Her primary concerns are:</p> <ul style="list-style-type: none"> <li>• No sewer//wastewater in residential zone and no sewer tight line to Carnation, Snoqualmie, or King County Metro.</li> <li>• Although a few small adjustments may be needed to the business district, there are several vacant business buildings in Fall City and therefore expansion/encroachment of the business district into existing residential areas will not improve business viability.</li> <li>• Apartments, condos and townhouses are not consistent with rural town character and no new permits should be issued.</li> <li>• The existing town boundary should remain unchanged. No special rezoning should be granted using the King County Comprehensive Plan/Fall City Subarea Plan update as a means to sidestep the permit/hearing process</li> </ul> <p>I find it confusing to have the Fall City subarea plan states "there should be no Metro trunk sewer connection to Fall City, only a self contained system for the business district only" and then state "In the future, <u>if</u> an alternative wastewater method has been investigated but not been put in place a tight lined sewer that is designed to only serve the downtown commercial district would then be consistent with policy R-508.</p> | <p>These comments are acknowledged and have been considered during the planning process.</p> <p>We are proposing an alternative, self contained, disposal system. Policy R-508 states that all alternatives must be exhausted before tight line sewers may be allowed. We are following the policy by pursuing an alternative system. Years in the future, if all alternatives have been exhausted, then sewer service that is tight lined and available to the business district only <u>may</u> be considered.</p> |
| <b>Divers, Tom and Terri, 33220 SE 44<sup>th</sup> Place, Fall City, WA 98024</b>   |  |
| <p>All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above</p>   | <p>See response to Adcox - above</p>   |

# E

| <b>Eberle, Peter, 18225 SE 147<sup>th</sup> Street, Renton, WA 98059</b>   |  |
|--|--|
| <p>Amend U-207 to require pre-annexation agreements for all PAAs</p> <p>Amend policies R-325 and F-249 to reflect the policies in the Countywide Planning Policies that were set aside regarding public school facilities in the Rural Area.</p> | <p>King County has negotiated with several cities on developing pre-annexation ILAs but to no avail due a plethora of issues. While it is not practical to require these agreements be put in place, King County will continue to work with cities on a case-by-case basis</p> <p>This issue is continuing to be debated at the countywide level through the update of the Countywide planning policies. The KCCP will be revised based on the outcome of that discussion at the countywide level.</p> |
| <b>Eiffert, Dave, 6819 409<sup>th</sup> Avenue SE, Snoqualmie, WA 98065</b>  |  |
| <p>CP-911, regarding annexation within the Snoqualmie Valley, should not be eliminated</p> <p>CP-919, regarding annexation within the Snoqualmie Valley should be modified</p>   | <p>This policy is being proposed for deletion because these issues are typically dealt with at the time of development and not at the time of annexation. Further, this policy is inconsistent with annexation policies in the rest of the county.</p> <p>Comment noted.</p>   |

# F

| <b>Freid, Robert, Alice, Spencer, and Abby, 14048 171<sup>st</sup> LN NE Woodinville, WA 98072</b> |   |
|--|---|
| <p>Opposes the proposal to move the urban Growth Boundary in the Sammamish Valley.</p>             | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area.</p> |

| <b>Farms for Life, farms4life.org</b>  |  |
|--|--|
| Opposes the proposal to move the urban Growth Boundary in the Sammamish Valley.  | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area. |
| <b>Faber, Chuck, <a href="mailto:rcfdwf@frontier.com">rcfdwf@frontier.com</a></b>  |  |
| <p>A current proposal to move the Urban Growth Boundary in the Sammamish Valley threatens not only the productive farmlands in the valley, but also the future of the quality of life for our greater Woodinville community.</p> <p>I am writing to express my support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley. This is in response to ongoing efforts by a group to convince the county to move the UGB and pave the way for an unneeded expansion of the City of Woodinville deeper into the valley.</p> | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area. |

G

| <b>Gould, T., <a href="mailto:4cleanair@usa.net">4cleanair@usa.net</a>, Seattle, WA 98103</b>   |   |
|---|---|
| <p>All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above</p> <p>Do not allow for urban service levels in the rural areas, including new schools</p> <p>Change how housing affordability is being assessed.</p> <p>Add design standards and codes that determine where and how development occurs within cities of King County.</p> | <p>See response to Adcox – above</p> <p>This issue is being debated at the countywide level through the update of the Countywide Planning Policies. Public facilities are not allowed in the rural area except for public schools.</p> <p>Comment noted; we are aware of the shortcomings of the current measurement system..</p> <p>King County does not govern land use in cities. However, King County does have Overlay Districts in the few urbanized commercial areas within unincorporated areas that support development of walkable communities.</p> |



**Gould, T., [4cleanair@usa.net](mailto:4cleanair@usa.net), Seattle, WA 98103 (Continued)**

|  |  |
|--|--|
| Travel demand forecasting incorporating the Countywide Planning Policies' Growth Targets is rendered moot if the Growth Targets are ignored by local jurisdictions. A focused process is needed to ensure local jurisdictions do indeed meet the growth targets assigned to them so the travel forecasting will be meaningful. Realistic and accurate growth targets will tie together Transportation and Land-Use planning. | The growth targets are not a forecast, neither are they a limit. Instead they are a policy statement of the Growth Management Planning Council expressed in numbers. The targets are established to ensure that King County and its cities can collectively accommodate the state Office of Financial Management's population forecast. For some jurisdictions, the targets diverge from actual expected growth. King County does not have the authority to control the growth of other jurisdictions nor mandate a new regional process. However, when preparing the travel demand forecast for the King County Comprehensive Plan we do try to incorporate any supplementary information available from cities on their expected growth (for example the city Comprehensive Plan or known large development proposals) into our travel forecast. |
| Suggested wording edits to narrative text regarding climate change and greenhouse gas emissions  | Text has been edited in response to comments.  |
| Incorporate policy guidance in T-337 stating a commitment to comply with state mandated VMT and GHG reduction laws through its transportation programs, facilities and projects.   | T-337 has been edited in response to this comment.   |
| In responding to transportation funding shortfalls, reassessing LOS should only be considered in the narrow context of motor vehicle travel and not for a full assessment of multi-modal transportation needs.   | Comment noted. Reassessing LOS is an option under GMA. King County evaluated its existing transportation levels of service, but did not make any changes to them during this update to the Comprehensive Plan.   |
| The only real long-term, equitable fix for transportation revenue sources is a sustainable user-weighted revenue source, specifically, a vehicle-miles-traveled tax. T-401b commendably mentions "user base funding mechanisms," but provides no specifics.  | King County is working with other agencies, jurisdictions and state and regional decision-makers to establish sustainable transportation funding sources. There are many options and we do not want to limit opportunities.  |
| Additional congestion-based fees for travel on the limited-access "premium" expressways in the urban area.   | Policy T-401e supports active management of state-owned freeways to optimize movement of people.   |

| <b>Gould, T., <a href="mailto:4cleanair@usa.net">4cleanair@usa.net</a>, Seattle, WA 98103 (Continued)</b>  |  |
|--|--|
| Comments: Levels of Service, G, T-207-T-209<br>King County should not allow LOS F for transportation concurrency testing to allow automatic passing of concurrency in congested areas. | This limited provision is provided to allow small development with minor impact to move forward in the development process and to facilitate essential public services. Note that public high schools in the Rural Area must still meet the LOS B standard.  |
| T-209 Urban Areas LOS standards and concurrency testing should include multimodal transportation elements.   | Policy T-218 provides for the use of factors for safety, pavement condition, and availability of multimodal transportation. The Transportation Concurrency Management (TCM) program is updated periodically. These factors will continue to be considered as part of future revisions to the TCM program.  |
| Concurrency should be fair and equitable for future growth and existing development and not used to justify increasing roadway capacity.   | The current TCM program and policies are consistent with this concept.   |
| T-216 Travel sheds that pass the concurrency test should not allow automatic concurrency approval for all new development.   | Any issues with automatic concurrency compliance in travel sheds that pass the concurrency test are offset by annual concurrency testing and update to the concurrency map. All development proposals must still go through the required SEPA and permit review process, which includes additional analysis and potentially mitigation, before approval. |
| T-219 The use of Transfer of Development Rights to meet concurrency requirements should be questioned, because any advantages through its use may be negated.                          | The use of TDR to meet concurrency requirements is allowed in the Rural Area of failing travel sheds to enable small scale (four lots or less) residential development. The sending and receiving sites must be in that same travel shed, resulting in no overall net impact to the travel shed.   |
| <b>Gunderson, Lori, 4144 330<sup>th</sup> Place SE, Fall City, WA 98024</b>  |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above   | See response to Adcox - above  |

**Greenstein, Steve** [steve@greenstein-golden.net](mailto:steve@greenstein-golden.net)

I am writing to express my support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley. This is in response to ongoing efforts by a group to convince the County to move the UGB and pave the way for an unneeded expansion of the City of Woodinville deeper into the Valley.

Our Woodinville community, both Urban and Rural, has a unique combination of amenities that make it such a desirable place for our families to live, work and play. We are also becoming respected as a regional destination.

A key contributor to this quality of life is the verdant Sammamish Valley. This cornerstone of Rural King County complements the cities of Woodinville and Redmond on each end and Kirkland on the west with its mix of productive farmlands, forested hillsides and clean air. The fresh produce, Valley trail and open space together provide a sense of place that is increasingly hard to find.

This has not come about through chance. Years of citizen involvement and resultant public policy have worked together to allow our community to evolve as it has. With continued consistent policy, our community can continue to grow and improve along this path.

The proposal to move the UGB in the Valley adjacent to Woodinville, in two places, would put all of this in jeopardy.

Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area.

**Greigor, Tessa, Cascade Bicycle Club,** [tessa.greigor@cascadebicycleclub.org](mailto:tessa.greigor@cascadebicycleclub.org)

E-205b - Comments were made to strengthen the commitment, work with additional partners, and reference other key state and regional greenhouse gas emissions reduction policies

Encourage the County to include policy language around VMT reduction requirements (pg 7)

"We urge the County to set clear targets for achieving the State-mandated VMT and GHG emission reduction goals through the implementation of its transportation programs and projects.

**T-337.** The King County Department of Transportation will develop methods to evaluate the climate change impacts of its actions and train staff to implement climate sensitive practices in its work.

*We recommend the following amendment to this policy: "...climate change impacts of its actions and train staff to implement climate sensitive practices in its work, and implement transportation strategies and policies to comply with the greenhouse gas reduction requirements in state law, Vision 2040, and the Countywide Planning Policies." (pg 13)*

With minor edits, the suggest language was accepted

Background related to VMT reduction targets was added to Chapter 4 in the climate change section

Policy T-337 was amended to read:

The King County Department of Transportation will develop methods to evaluate the climate change impacts of its actions and the transportation system, and implement climate sensitive strategies and practices consistent with the environmental sustainability goals and policies described in Chapter 4, Environment, as well as existing state, regional and local laws and regulations.

**Greegor, Tessa, Cascade Bicycle Club, [tessa.greegor@cascadebicycleclub.org](mailto:tessa.greegor@cascadebicycleclub.org)**  
**(Continued)**

RP-106 amend policy to replace “should” with “shall” and modify planning to refer to “land use and transportation.”

Text under “Planning Framework” should be modified to add bicycling to list of components for making town centers suitable for all modes.

RP-206a Elements of drawing the nexus between land use and transportation should be highlighted.

Text under “Urban Communities” should be amended to add “active transportation modes walking and bicycling” following “discourage” and add “bicycling infrastructure” to list of community features.

U-108 Support change

U-113a Support policy; expand to include all travel routes that are used by pedestrians and bicycle riders, regardless of formal programs in place.

U-127 Add more specific language the type of developments desired.

U-129 Support change

U-157 Expand description of bicycle lanes to “separated and/or protected bicycle facilities.”

U-167 Same comment as above

U-301 Add the intersection of housing, transportation, and TOD to this policy

Policy will be amended as suggested.

Text will be amended as suggested.

This policy reflects the content of the King County Strategic Plan, which is amended under a different process.

Text will be amended to add “bicycling infrastructure” as suggested.

Comment noted.

Comment noted.

Comment noted; suggested language is too specific for policy

Comment noted.

Policy will be amended to replace “bicycle lanes” with “bicycle facilities” as suggested.

Policy will be amended to replace “bicycle lanes” with “bicycle facilities” as suggested.

Policy will be amended to reflect suggested language.

**Greegor, Tessa, Cascade Bicycle Club, [tessa.greegor@cascadebicycleclub.org](mailto:tessa.greegor@cascadebicycleclub.org)**  
**(Continued)**

|   |   |
|---|---|
| <p>U-309 Add "transportation choices" as a desired outcome land use and investment strategies</p> <p>U-318 Add "transit and other forms" to modify motorized transportation</p> <p>U-321 Expand description of alternative transportation to include "modes of travel alternative to the automobile"</p> <p>U-322 Expand list of access elements to include "public transportation, sidewalks, and bicycle infrastructure"</p> <p>Text under Sustainable Development Support change</p>   | <p>Policy will be amended to reflect suggested language.</p> <p>Policy will be amended to reflect suggested language.</p> <p>Policy will be amended to reflect suggested language.</p> <p>Policy will be amended to reflect suggested language.</p> <p>Comment noted.</p>   |
| <p>We were impressed by the acknowledgement of nonmotorized transportation as an integral component to a sustainable, healthy and thriving King County.</p> <p>We support the guiding framework as outlined in the introduction to the transportation chapter, and a majority of the policies stated within the chapter, however strongly encourage incorporation of the following recommendations to achieve the goals and objectives referenced throughout the plan.</p>  | <p>Comments noted</p>   |
| <p>Complete Streets:<br/>         Adopt and incorporate a Complete Streets Policy and Guiding Implementation Framework within the King County Comprehensive Plan that reflects commitment that all transportation projects, including design, planning, reconstruction, rehabilitation, maintenance, or operations by King County shall be designed and executed to accommodate and encourage travel by bicyclists, public transportation vehicles and their passengers, and pedestrians of all ages and abilities. Given the varying needs in urban, suburban and rural settings across the county, the policy should provide flexibility in its application to different contexts. Clear guidance should be outlined for justifying an exception to implementing a Complete Street.</p> | <p>King County supports and encourages multimodal travel and equitable access to a variety of transportation options for all users. This is reflected in the proposed Comprehensive Plan policies and through many existing county programs, practices and standards. For example, the adopted King County Road Design and Construction Standards already require new roadway and reconstruction projects to incorporate non-motorized uses of the right-of-way and evaluate the needs of all users. A variance from these Standards can only be granted by the County Road Engineer. King County will be initiating an update to the county's nonmotorized plan in 2012 and Cascade Bicycle Club will be invited to participate in that effort. The complete streets concept and its applicability to the county's urban and rural areas can be discussed and evaluated in that forum.</p> |

**Greggor, Tessa, Cascade Bicycle Club, [tessa.greggor@cascadebicycleclub.org](mailto:tessa.greggor@cascadebicycleclub.org)**  
**(Continued)**

|  |   |
|--|---|
| Multimodal Level of Service and Concurrency: Adopt a multimodal LOS framework and standards, and include multimodal performance standards and improvements as a key element to in the Transportation Concurrency Management program                            | Policy T-218 provides for the use of factors for safety, pavement condition, and availability of multimodal transportation. The Transportation Concurrency Management (TCM) program is updated periodically. These factors will continue to be considered as part of future revisions to the TCM program.   |
| We support the County's commitment to variable tolling strategies and specifically encourage even greater emphasis on the potential for system-wide tolling within the county.   | Comment noted. Proposed Policies T-224p and T-244u support the use of variable tolling strategies (which includes system-wide tolling) to promote mobility options and promote travel efficiencies. These policies are consistent with Transportation 2040, the regional transportation plan, which calls for a phased approach to tolling starting with developing HOT lanes, and then tolling individual highway and bridges in their entirety, and then calls for full highway system tolls by about 2030. |
| Use the term "collision" or "crash" in place of "accident". An accident indicates that such incidents are <i>not</i> preventable, when indeed all collisions are an outcome of something that could have been prevented – human behavior, roadway design, etc. | Wording has been changed.   |
| Incorporate policy guidance stating a commitment to comply with state mandated VMT and GHG reduction laws through its transportation programs, facilities and projects.  | T-337 has been revised to address this comment.   |
| Modify T-201b to recognize the unique needs for multimodal travel in rural parts of county; residents of rural King County should be afforded safe and accessible opportunities to walk and bicycle to destinations.   | Comments noted. Our focus in the rural area is to invest strategically to help meet the highest priorities, including connectivity and access to destinations where there is high need and potential usage.   |
| Strongly support policy T-203  | Comment noted   |
| Modify T-204 to incorporate language re, multimodal improvements, vulnerable populations, and serving all roadway users.   | Comment noted. These issues are addressed in the nonmotorized section.  |
| T-205 and T-205a We support both policies, however encourage the County to incorporate Complete Streets language within T-205.   | Comments noted. See prior complete streets response.  |
| T-205a Should also highlight the need to address unsafe transitions between bicycle and pedestrian facilities in areas that currently function as jurisdictional gaps in the system.   | Comments noted. See prior complete streets response.  |

**Greegor, Tessa, Cascade Bicycle Club, [tessa.greegor@cascadebicycleclub.org](mailto:tessa.greegor@cascadebicycleclub.org)**  
**(Continued)**

|   |  |
|---|--|
| Modify T-223 to include language to include improvements to nonmotorized infrastructure as a component of impact mitigation.  | Comment noted. We have added a new policy T-224p regarding regional bicycle planning that could help to address this issue.  |
| Modify T-224a to say "shall accommodate" rather than "shall consider" the needs and abilities of nonmotorized users of the transportation system...   | Comment noted. There must be a direct nexus between impacts of a new development and our required mitigation. It would be difficult to determine a trigger or threshold for requiring nonmotorized improvements based on the impacts of a development.   |
| Modify T224b to include language regarding and providing opportunities for healthy activity and alternatives to driving for all populations.  | <p>Comment noted. While these needs are given serious consideration, they cannot always be accommodates in every location and situation.</p> <p>Note that "plan" and "operate" have been added to T-224a.</p> <p>T-224b revised in response to comment</p>   |
| Modify 224c to address safety of users  | . T-224c revised   |
| Modify T224d to include criteria outlining what is deemed appropriate and what is deemed feasible, making the procedure for exceptions to implementing this policy specific. Suggest using common specified exceptions to constructing complete streets   | Comment noted. The adopted King County Road Design and Construction Standards require new roadway and reconstruction projects to incorporate non-motorized uses of the right-of-way and evaluate the needs of all users. A variance from these Standards can only be granted by the County Road Engineer |
| Incorporate the criteria established in the King County Transportation Programming Tool to guide the nonmotorized prioritization process discussed in Policies T-224 and T-224f.  | The programming tool is currently used, along with other criteria, in the prioritization process for nonmotorized projects. This has now been noted explicitly in the text. T-224 has been clarified to indicate the list represents highest priorities, not the full set of criteria.                   |
| T-224g While we agree that the King County Regional Trail System should serve as the backbone in the Rural Area, this policy should also acknowledge that the regional trail system may not sufficiently accommodate all desired nonmotorized travel and trips and thus roadways need to provide safe functionality for nonmotorized users as well. | Comment noted. Our focus in the rural area is to invest strategically to help meet the highest priorities, including connectivity and access to destinations where there is high need and potential usage.   |



**Greegor, Tessa, Cascade Bicycle Club, [tessa.greegor@cascadebicycleclub.org](mailto:tessa.greegor@cascadebicycleclub.org)**  
**(Continued)**

|   |   |
|---|---|
| Modify T224o to include projects that have the potential to impact nonmotorized users.  | Policy revised to address comment   |
| We encourage the county to place even greater emphasis within policy framework around the importance of public transportation from a public health perspective – recognizing that the majority of transit users engage in physical activity when traveling to and from transit services.                                  | This issue is addressed in text throughout chapter. See pages 7-11, 7-19, 7-21 for example.   |
| Place greater emphasis on the importance of facilitating a strong integration between public transit and non-motorized infrastructure.  | Language has been added to page 7-19 and policy T201a to more explicitly address this issue.  |
| We support policy T-202a, yet encourage the County to include additional language explicitly stating a commitment to supporting the provision of safe, connected and attractive pedestrian and bicycle infrastructure within the catchment areas defined by the FTA, in relation to King County Metro stops and stations. | King County Metro provides transit service throughout the county and serves many local jurisdictions. However, King County has little ability to control the provision of infrastructure within other jurisdictions. Policy as written reflects adopted Strategic Plan for Public Transportation.         |
| We recommend the following amendment to T-301a: "...implementation of the public transportation system and services operated by the King County Metro Transit Division in order to provide fast, frequent, reliable, and effective service to the most number of riders possible.   | Comment noted. The Comprehensive Plan reflects the policy established in adopted Strategic Plan for Public Transportation.  |
| We support policy T-301 and further encourage the County to include specific language referencing system access that aligns with the FTA 3 and 1-mile access sheds for bicyclists and pedestrians, respectively.  | Comment noted. The KC Comprehensive Plan reflects policy established in adopted Strategic Plan for Public Transportation. Such a change would need to be considered as part of an update to Metro's Strategic Plan.   |
| Level of Service Standards<br>A multimodal level of service framework would enable King County to compute the level of service afforded to all roadway users, and consider the tradeoffs to each user group when considering roadway projects.  | Policy T-218 provides for the use of factors for safety, pavement condition, and availability of multimodal transportation. The Transportation Concurrency Management (TCM) program is updated periodically. These factors will continue to be considered as part of future revisions to the TCM program. |
| T-218 Recommend this policy is amended to change the word "may" to shall" in reference to the concurrency test including provisions of factors for safety, pavement condition, and availability of multiple modes of transportation.  | Comment noted.  |

**Greegor, Tessa, Cascade Bicycle Club, [tessa.greegor@cascadebicycleclub.org](mailto:tessa.greegor@cascadebicycleclub.org)  
(Continued)**

Proposed edits to Chapter 10, Community Plans, policies CP-112, CP-118, CP-209, CP-711 to strengthen nonmotorized travel options and facilities.

Comments are noted. The policies in this chapter were developed through extensive past community planning processes. We do not have the resources to conduct the public process we think is needed to do a thorough review of all of the community plan policies - instead we are focusing our efforts and limited resources on countywide policy updates and development.

# H

**Haakenson, Eric, Policy Committee, Sno-Valley Tilth, P.O. Box 48, Carnation, WA 98014**

Sno-Valley Tilth, its Board and members, stand in united opposition to the conversion of APD lands to any other use. We believe the State GMA and the King County Comprehensive Code make it abundantly clear that the history of encroachment of urban and industrial growth on agricultural lands demonstrates the need to hold inviolate the existing boundaries of lands in designated APDs.

Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E.**

Public Review Draft Policy U-124 is not in compliance with Countywide Planning Policies (CPP) LU-29 and LU-33; these policies require an ILA between city and county to be in place for PAAs which establish the zoning, development standards, etc. Propose updating all TDR policies to be compliant with the proposed new section U-124 (e).

King County remains committed to developing ILAs with cities in regards to their PAAs. It is important that each city be equally committed to ILA development, as any such agreement needs both parties.

Encouraging development inside the County's designated urban growth area (UGA) is much preferable to development outside the UGA (i.e. in the county's rural areas); TDR is a policy tool used by the county to achieve this growth management outcome.

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

The county is working with many of its cities to expand the regional TDR effort, now supported by the State through recent legislation (ESSB 5253), to steer future development from the rural areas into cities' urban centers. The county's first priority is to use the TDR tool for Urban Center development in cities (see proposed R-319).

However, the county is also committed to maintain the application of TDR in its unincorporated urban areas, and do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.

In this context, the county will amend the currently proposed policies to reflect: (1) the need to develop, with cities, design guidelines for their respective PAAs; and (2) the county's use of TDR amenity funds in urban unincorporated areas/PAAs after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.

Some important background response that applies to all the following comments regarding TDR policies in Ch3 of the Comp Plan:

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

|   |   |
|---|---|
|   | <p>A total of 254 TDRs have been used or recorded into development projects in the county's urban growth area. 47% of these have been used inside cities and 52 % used in the urban unincorporated area of King County.</p> <p>TDR contributes a relatively marginal amount of development capacity to projects built inside the County's UGA. That is, across all projects that used TDR in the County's unincorporated urban areas over the last 10 years, the total percentage of units added from TDR relative to the total number of units built in all the projects = 13.7% (i.e. of the nearly 1000 units built at residential developments in the unincorporated UGA at which TDRs were used, fewer than 140 of these units were added by use of TDRs).</p> <p>TDR is one option for builders to increase their project development capacity by a set amount as established by KC's zoning code. That is, zoning sets a minimum density and a maximum density. Set maximum density is achievable through a menu of residential density incentive options, TDR being but one. TDR does <b>not</b> allow increases in density above the maximum set in zoning code.</p> |
| <p>Re Public Review Draft Policy U-125. Current CPPs LU-29 and LU-33 require development and zoning to be consistent with the annexing city's zoning. King County Comprehensive Plan Policies must be self consistent on this issue and compliant with the adopted CPPs LU-29 and LU-33, and Joint planning ILAs with PAA cities must be implemented as soon as possible.</p> | <p>See response to first comment above.</p>   |

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

|  |   |
|--|---|
| <p>Re Public Review Draft Policy U-344. CPP LU-29 and LU-33 require development and zoning to be consistent with the annexing city's zoning.</p> <p>Implementation of incentive plans in PAAs, such as the TDR Program, must be compliant with current CPP LU-29 and LU-33 and their implementing ILAs</p>   | <p>U-344 as drafted is consistent with, an reinforces, CPP LU-29 and LU-33</p>  |
| <p>Re Public Review Draft Policy U-316.</p> <p>Current Countywide Planning Policies LU-29 and LU-33 require development and zoning to be consistent with the annexing city's zoning. Recommend adding to proposed policy U-316 language that states the county <u>"shall execute interlocal agreements with annexing cities in PAAs specifying..."</u></p>   | <p>See response to first comment above.</p>   |
| <p>Re Public Review Draft Policy U-207.</p> <p>U-207 has established a good framework for the implementation of these policies in the required ILAs. Need to execute ILAs with cities to implement U-207 and be consistent with LU-29 and LU-33</p>  | <p>U-207 as proposed aligns with CPPs LU-29 and LU-33 and address much of the comments and concerns mentioned above.</p> <p>Re execution of ILAs, See response to first comment above</p>   |
| <p>Re Public Review Draft Policy R-301.</p> <p>There are two fundamental problems with the proposed <u>"However, until such time as the Urban Unincorporated Areas are annexed, King County shall continue to provide services in these areas ((focus its resources on the unincorporated Urban Area until such time that these areas become part of cities))."</u></p> <ol style="list-style-type: none"> <li>1) The text refers exclusively to the Urban area and should not be buried in the Rural chapter of the Comprehensive Plan.</li> <li>2) Inappropriately abdicates responsibility under GMA and state land use law for the conscientious and professional urban planning that is required to ensure sustainable and consistent urban development that King County is charged under the same regulation for reviewing and permitting</li> <li>3) retain current text but move into chapter 2</li> </ol> <p>Re Public Review Draft Policy R-315.</p> <p>Most of the transactions recorded by the TDR program, 139 of 254 units) in over a decade have been private to private transactions. More than half of the transactions have been urban to urban (91) rather than rural to urban (163).</p> | <p>Proposed Policy R-301 is consistent with Ch 2 policies and CPPs and should remain in Ch3.</p> <p>However, recommend removing the insertion below from draft policy R-301 to maintain rural theme in ch 3.</p> <p><u>"However, until such time as the Urban Unincorporated Areas are annexed, King County shall continue to provide services in these areas"</u></p> <p>Since TDR program inception in 2001 there have been 254 TDRs used or recorded into development projects. 47% of these have been used inside cities and 52 % used in the urban unincorporated area of King County.</p> |

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

While millions of dollars in King County funds are now guaranteed via ILAs with Issaquah, Seattle, Bellevue and Sammamish in exchange for these cities agreeing to accept a limited number of TDR units, ZERO amenity funding has been allocated or even offered to Urban Unincorporated Areas which have seen more than twice the number of TDR units approved as have been built in cities.

Implementation of the Washington State Regional TDR legislation without policy, code and administrative rule adjustment to eradicate amenity funding inequity and the non-compliance with current Countywide Planning Policy is not allowed under the requirement for the King County Comprehensive Plan to be self consistent and consistent with all other superseding policies and codes.

Re-evaluation of the implementation of the TDR program is needed. Actual implementation is not achieving the goals identified in R-315 a. and b. The residents of Unincorporated Urban communities of King County which have and will continue to receive approved TDR projects are being treated inequitably. These communities must be prioritized for investment to offset already imposed increased impacts of the increased development consistent with the level guaranteed in the TDR ILAs, and future TDR projects must require the projects to mitigate at an equitable level. Further implementation of the Washington State Regional TDR legislation must be postponed until the necessary policy, code and administrative rule adjustments are adopted.

Since TDR program inception, there have been 70 transactions that involved the buying and selling of TDRs. 90% of all these transactions were directly between private party sending and receiving site landowners, and facilitated by King County. The remaining 10% involved the King County TDR Bank buying from private landowners and selling to private developers.

Proposed Public Review Draft Policy R-315 and R-319(a) include new references that tie TDR amenity funding to cities *and* urban unincorporated areas.

The county is committed to maintain the application of TDR in its unincorporated urban areas, and do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.

In this context, the county will amend the currently proposed policies to reflect: (1) the need to develop, with cities, design guidelines for their respective PAAs; and (2) the county's use of TDR amenity funds in urban unincorporated areas/PAAs after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied

|  |   |
|--|---|
| <p>Re Public Review Draft Policy R-316</p> <p>"Close proximity" is dangerously vague. It is not defined anywhere, and, in light of the historical implementation of the TDR program in conflict with adopted Countywide Planning and other policies, can reasonably be expected to be implemented in a manner other than intended.</p> <p>Retain current text in R-316(b)</p> <p>Re Public Review Draft Policy R-319</p> | <p>Implementation of the TDR program <i>has</i> aligned with R-315 (a) and (b) as well as R-312 and R-313.</p> <p>90% of all the TDR transactions that occurred were directly between private party sending and receiving site landowners and facilitated by King County;</p> <p>The King County TDR Bank has facilitated the TDR market by buying, holding, and selling TDRs from willing private landowners related to 10% of the total # of TDR transactions;</p> <p>Consistent with R-313 and 312, so far the TDR program has protected from development 141,500 acres of private Rural and Resource lands;</p> <p>Consistent with R-313 and 312, 99% of all the TDRs used have gone into the County's Urban Growth Area</p> <p>63% of all TDRs transferred into the county's UGA (both into cities and unincorporated urban) have been TDRs from rural and resource zoned lands; the remainder were from urban separator greenbelt lands.</p> <p>KC TDR program is focused on sending sites that capture all aspects of R-316; some are adjacent to UGA line and some are very close, but not adjacent, and some are distant from the UGA line (e.g. Farm land and Forest land). "Adjacent" is too limiting for operation purposes.</p> <p>The TDR program goal (R-312 &amp; 313) is to transfer rural development potential into the entire county UGA – both cities and county areas.</p> <p>Proposed R-319 more clearly establishes the order of preference for TDR receiving sites, with Urban Centers being the County's clear preference over other non-urban center unincorporated.</p> |
|--|---|



**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

The proposed update is welcomed. However, the proposal is not strong enough to ensure that the increased impact of new development will be located on sites adequately prepared to accommodate those needs.

Propose adding to R-319(c):

(c) Other unincorporated urban areas for which a joint planning Interlocal Agreement consistent with Countywide Planning Policies U-29 and U-33 have been executed and remains in effect

The county is committed to maintain the application of TDR in its unincorporated urban areas, and do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.

In this context the county will amend the currently proposed policies to reflect: (1) the need to develop, with cities, design guidelines for their respective PAAs; and (2) the county's use of TDR amenity funds in urban unincorporated areas/PAAs after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.

Given the statistics mentioned immediately below, which show only a marginal increase in density associated with projects using TDR in parts of the County's unincorporated UGA, precluding the use of TDR in these areas without a PAA ILA in place with a particular city would forego the growth management benefits that TDR in the unincorporated areas provide.

Across all projects that used TDR in the unincorporated urban areas, the total percentage of units added from TDR relative to the total number of built units in all the projects = 13.7% (i.e. of the nearly 1000 units built at residential developments in the unincorporated UGA at which TDRs were used, fewer than 140 of these units were added by use of TDRs).

|   |   |
|---|---|
| <p>Re Public Review Draft Policy R-319(a)</p> <p>The proposed policy encodes disgraceful inequity and is extremely difficult to discuss</p> <p>King County must provide equitable funding levels to incorporated and unincorporated for urban area amenities in TDR receiving communities to offset the increased need for infrastructure and services that result from the increased needs resulting from increased density</p>  | <p>Proposed policy R-319(a) treats TDR program amenity funding to cities and unincorporated urban areas the same. Inclusion of reference to unincorporated urban area amenity funding is new insertion.</p> <p>The county is committed to maintain the application of TDR in its unincorporated urban areas, and do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.</p> <p>In this context the county will amend the currently proposed policies to reflect use of TDR amenity funds in urban unincorporated areas/PAAAs after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.</p> |
| <p>Re Public Review Draft Policy R-319(b)</p> <p>Propose deleting part of policy that states: <u>“Development rights purchased through such a program should be sold into any appropriate urban location”</u> is redundant at best. Receiving site policy is defined in other policies.</p>   | <p>This language is appropriate to guide where the TDR Bank can sell its TDR credits.</p>   |
| <p>Re Public Review Draft Policy T-202(b)</p> <p>The proposed update is consistent with Countywide Planning Policies and Vision 2040. It also serves to clarify the stark difference between the characteristics of communities in which most TDRs have actually been built to date as opposed to the characteristics of communities with services and infrastructure adequate to responsibly serve the increased impacts of the increased development.</p> <p>Ensure that all of the Comprehensive Plan policies related to the TDR program are consistent with the proposed T-202b and that no TDR project is approved in conflict with it.</p> | <p>Goal of the TDR program is to transfer rural development potential into the entire county UGA (R-312 &amp; 313). Preference is into cities and urban centers before other urban areas, as supported by policy R-319.</p>   |

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

Development proposals that have been submitted as rezones and subsequently denied must not be approved if resubmitted as TDR applications.

TDR does **not** allow increases in density above the set maximum set in zoning code. TDR is one option for builders to increase their project development capacity by a set amount, up to the maximum, as established by KC's zoning code.

TDRs must be forbidden in Potential Annexation Areas unless there is an adopted joint planning Interlocal Agreement and associated development plan with the annexing city that specifically addresses the appropriate mitigation, location and design for TDR projects in accordance with the adopted Codes and Policies detailed above in this document.

The county is committed to maintain the application of TDR in its unincorporated urban areas, and do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.

In this context, the county will amend the currently proposed policies to reflect: (1) the need to develop, with cities, design guidelines for their respective PAAs; and (2) the county's use of TDR amenity funds in urban unincorporated areas/PAAs after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.

Given the statistics previously mentioned, which show only a marginal increase in density associated with projects using TDR in parts of the County's unincorporated UGA, precluding the use of TDR in areas without a PAA ILA in place with a particular city would forego the growth management benefits that TDR in the unincorporated areas provide.

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

If a proposed TDR project contributes traffic to any location on the King County Transportation Needs Report, funding must be secured to fix that need. Project can contribute the full cost to fix that need.

The King County Transportation Needs Report is a long range facility needs document for the Comprehensive Plan. It is not a tool to secure individual contributions from developers. Policy U-124b, requires the use of TDR to comply with the Transportation Concurrency Level -of-Service Standards. If a concurrency travel shed does not meet standard, a TDR proposal is effectively stopped. The TDR proposal also must pay a development impact fee to mitigate the traffic impacts under King County's Mitigation Payment System (MPS) program. If the TDR proposal continues in the development review process, additional SEPA mitigation maybe required as part of the permit approval.

Since the King County Comprehensive Plan R-319 establishes Urban Centers as the most appropriate location for TDR receiving site, proposed project sites must meet at least 1/2 of the characteristics that define an Urban Center as adopted in the Countywide Planning Policies (LU-40 through LU-46).

Policy R-319 sets the hierarchy for TDR receiving sites. The TDR program goal is to transfer rural development potential into the entire county UGA (R-312 & 313). Preference is into cities and urban centers before other urban areas, as supported by policy R-319.

Given the statistics previously mentioned, which show only a marginal increase in density associated with projects using TDR in parts of the County's unincorporated UGA, limiting the use of TDR in this way would forego the growth management benefits that TDR in all the unincorporated areas provide.

**High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)**

|  |  |
|--|--|
|  | <p>It is important to use “carrots” and not “sticks” to encourage developers to build and use TDR in the Urban and Commercial Centers. The County encourages TDR in unincorporated urban and commercial centers via greater density incentives in centers over other KC UGA areas (see R-321 c)</p>  |
| <p>No TDR project shall be approved that does not:</p> <ul style="list-style-type: none"> <li>a) have a walkable site plan and walkable access to transit service with all day in- and out-bound weekday routes as well as weekend service.</li> <li>b) allow public access to the recreation facilities as otherwise required by code.</li> </ul> | <p>See response above.</p>   |
| <p>All Urban Unincorporated Area TDR receiving sites must receive amenity investment comparable to amenity funding guaranteed in TDR ILAs.</p>   | <p>Proposed Public Review Draft Policy R-315 and R-319(a) include new references that tie TDR amenity funding to cities <i>and</i> urban unincorporated areas.</p> <p>The county is committed to maintain the application of TDR in its unincorporated urban areas, and do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.</p> <p>In this context the county will amend the currently proposed policies to reflect use of TDR amenity funds in urban unincorporated areas/PAAAs after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.</p> |
| <p>All funds that the County sends to the Cities must be posted in a timely manner to the TDR website for public review.</p>   | <p>Posting information onto the TDR program website related to city-county TDR ILAs will be done in 2012 and will be updated on an on-going basis.</p>   |

| <b>High, Gwendolyn, P.O. Box 2936, Renton, WA 98056, C.A.R.E. (Continued)</b>  |  |
|--|--|
| A schedule of the due dates of all report deliverables identified in ILAs with receiving cities must be posted to the TDR website. When any report deliverable is submitted to the City or County, per the requirements of the ILA, that report delivered will be posted TDR website for public review.  | Interested Public can simply call TDR office which will supply interested public with these reports as they become available.  |
| <b>Howell, Brock, KC Program Director, Futurewise, <a href="mailto:Brock@futurewise.org">Brock@futurewise.org</a></b>  |  |
| <p>Futurewise strongly supports T-201a, increasing and improving transit, bike, and pedestrian infrastructure and interconnectedness in urban areas, as a strategy to reduce greenhouse gas emissions, improve public health, and increase transportation affordability.</p> <p>Futurewise strongly supports T-202a, increasing mixed-use development in high-capacity station areas.</p> <p>Recommendation #2 Tie Transportation to Climate Goal<br/>The Comprehensive Plan should specifically require reductions of transportation-related greenhouse gas emissions at least equivalent to the state and county reduction goals. Futurewise strongly recommends amending T-337 accordingly</p> <p>Recommendation #6 System-wide Tolling<br/>King County should make system-wide tolling a priority and add a policy to the transportation chapter stating support for system-wide tolling to discourage SOV travel and sustainably fund the entire transportation system.</p> | <p>Comment noted.</p> <p>Comment noted.</p> <p>T-337 has been revised to address this comment.</p>   |
| <p>Suggest new policy: "King County shall support system-wide tolling to discourage single-occupancy vehicle travel and to sustainably fund the entire transportation system, including transit, bike, and pedestrian infrastructure and service, and transit-oriented development, and should help coordinate regional cooperation between state agencies and local governments."</p> <p>Clarify T-301 in order to make sure the "Strategic Plan for Public Transportation" and "Metro Service Guidelines" are aimed to provide fast, frequent, reliable service to the most number of riders possible. This will ensure an efficient use of taxpayer resources and reduce the most greenhouse gas emissions.</p>   | <p>Comment noted. Proposed Policies T-224p and T-244u support the use of variable tolling strategies (which includes system-wide tolling) to promote mobility options and promote travel efficiencies. These policies are consistent with Transportation 2040, the regional transportation plan, which calls for a phased approach to tolling starting with developing HOT lanes, and then tolling individual highway and bridges in their entirety, and then calls for full highway system tolls by about 2030.</p> <p>Comment noted. The Comprehensive Plan reflects the policy established in the adopted Strategic Plan for Public Transportation.</p> |

**Howell, Brock, KC Program Director, Futurewise, [Brock@futurewise.org](mailto:Brock@futurewise.org) (Continued)**

Re Public Review Draft Policy R-321(b) and 309

To maintain rural character and prevent undue economic burdens for farmers, Futurewise strongly recommends eliminating all of R-321b and striking part of R-309. With regard to R-309, we specifically request the following language to be stricken:

**R-309 The RA-2.5 zone has generally been applied to rural areas with an existing pattern of lots below five acres in size that were created prior to the adoption of the 1994 Comprehensive Plan. These smaller lots may still be developed individually or combined, provided that applicable standards for sewage disposal, environmental protection, water supply, roads and rural fire protection can be met. A subdivision at a density of one home per 2.5 acres shall not be allowed. ~~((only be permitted through the transfer of development rights ((credits)) from property in the designated Rural Forest Focus Areas. The site receiving the density must be approved as a Transfer of Development Rights receiving site in accordance with the King County Code. Properties on Vashon-Maury Islands shall not be eligible as receiving sites.))~~**

RP-Section II-B Supports finding that there is sufficient land within the UGA to accommodate housing, commercial and industrial uses through 202 and beyond and therefore, no need to expand the UGA.

U-118 Add that average zoning density should be increased to 30 dwelling units per acre and in coordination with cities.

U-122 Add a number to minimum density of 7 du/acre

U-153, U-162, U-167 Add more specific language regarding design standards within urban commercial areas.

U-402a Supports the development of broadly accepted sustainability performance goals and metrics.

The County has seen a very few uses of rural-to-rural TDR under the limited circumstances allowed in policy and code.

To date, the TDR program has only completed 2 rural-to-rural transfers under the limited conditions of transferring from a "rural forest focus area" into existing RA-2.5 zoned areas that are already surrounded by an existing pattern of small 2 acre or less lot sizes and served by public "Group A water".

Allowing use of TDR in this limited capacity maintains a "no net increase in rural density" while maintaining *the* focus of the county's TDR program to be rural-to-urban transfers. It also offers some landowners of RA-2.5 zoning who were down-zoned to 5 acre lots some flexibility.

Comment noted.

Comment noted.

King County does coordinate with the cities through the development of the Buildable Lands Report and the Countywide Planning Policies. While 30 du/acre is a laudable goal, it is not realistic to establish it as an average density.

Minimum density is addressed in King County Code 21A.12.030 as 85% of stated residential densities within the urban area.

**Howell, Brock, KC Program Director, Futurewise, [Brock@futurewise.org](mailto:Brock@futurewise.org) (Continued)**

Fully Contained Communities Supports the policy to prohibit new FCCs within King County, consistent with the GMA. Add more specificity regarding development standards within FCCs.

There should be a mandatory climate goal.

Design standards are applied through development regulations and Special District Overlays and not within policy.

Comment noted.

Since King County is not planning any new FCCs and the current FCC at Redmond Ridge has been developed, these additional standards are not applicable.

Goal was strengthened to a requirement to comply with state law. Baseline year remains 2007 because there is not sufficient data to use a 1990 baseline. King County's target remains more aggressive than state law

## Tie transportation to climate goal

E-307e – recommendation to consider a range of future climate scenarios **based on best available science**

|                                  |
|----------------------------------|
| Policy T-337 is amended to read: |
|----------------------------------|

The King County Department of Transportation will develop methods to evaluate the climate change impacts of its actions and the transportation system, and implement climate sensitive strategies and practices consistent with the environmental sustainability goals and policies described in Chapter 4, Environment, as well as existing state, regional and local laws and regulations. Change made.

Futurewise strongly supports T-201a, increasing and improving transit, bike, and pedestrian infrastructure and interconnectedness in urban areas, as a strategy to reduce greenhouse gas emissions, improve public health, and increase transportation affordability.

|                |
|----------------|
| Comment noted. |
|----------------|

Futurewise strongly supports T-202a, increasing mixed-use development in high-capacity station areas.

|                |
|----------------|
| Comment noted. |
|----------------|

**Recommendation #2 Tie Transportation to Climate Goal**  
The Comprehensive Plan should specifically require reductions of transportation-related greenhouse gas emissions at least equivalent to the state and county reduction goals. Futurewise strongly recommends amending T-337 to reflect this.

T-337 has been revised to address this comment.



| <b>Howell, Brock, KC Program Director, Futurewise, <a href="mailto:Brock@futurewise.org">Brock@futurewise.org</a> (Continued)</b>  |  |
|--|--|
| <p>Recommendation #6 System-wide Tolling<br/>King County should make system-wide tolling a priority and add a policy to the transportation chapter stating support for system-wide tolling to discourage SOV travel and sustainably fund the entire transportation system.</p> <p>Suggest new policy: “King County shall support system-wide tolling to discourage single-occupancy vehicle travel and to sustainably fund the entire transportation system, including transit, bike, and pedestrian infrastructure and service, and transit-oriented development, and should help coordinate regional cooperation between state agencies and local governments.”</p>  | <p>Comment noted. Proposed Policies T-224p, T-244u and T-224v support the use of variable tolling strategies (which includes system-wide tolling) to promote mobility options and promote travel efficiencies. These policies are consistent with Transportation 2040, the regional transportation plan, which calls for a phased approach to tolling starting with developing HOT lanes, and then tolling individual highway and bridges in their entirety, and then calls for full highway system tolls by about 2030.</p> |
| <p>Clarify T-301 in order to make sure the “Strategic Plan for Public Transportation” and “Metro Service Guidelines” are aimed to provide fast, frequent, reliable service to the most number of riders possible. This will ensure an efficient use of taxpayer resources and reduce the most greenhouse gas emissions.</p>  | <p>Comment noted. The Comprehensive Plan reflects the policy established in the adopted Strategic Plan for Public Transportation.</p>  |
| <b>Huling, Don, 17117 SE 329<sup>th</sup> Street, Auburn, WA 98092-2712</b>  |  |
| <p>In reviewing the Comp Plan revision for 2012, I noted that nearly every paragraph is at odds with what is being allowed in the Pacific Raceways ordinance 2011-0227. The Comp Plan should specify that Pacific Raceways is exempt from all the requirements of this chapter, and the ordinance should state up front that this Comp Plan chapter does not apply to Pacific Raceways.</p> <p>The Comprehensive Plan update includes policies directed at protecting biodiversity. At the same time, the County Council is considering an ordinance which would allow a regional motor sports facility in rural King County that would contribute to climate change and have an adverse impact on the environment. The ordinance could also lead to requests from other developers for similar fast track permit approvals.</p> | <p>Comments acknowledged. Pacific Raceways is not exempt from the King County Comprehensive plan.</p> <p>As of January 2012, the referenced ordinance is still under consideration by the County Council. Executive staff have raised concerns some elements of the proposal. In late January, a revised substitute ordinance was released for public comment by the prime sponsor. Most of the concerns raised by Executive staff have been addressed in this version.</p>  |

|   |  |
|---|--|
| <b>Hutto, Nancy, chair, Agriculture Commission</b>  |  |
| <p>Propose collaboration</p> <p>Recognize that original policy was a stopgap measure and intent was to have farm, fish and flood interest work together on an integrated approach.</p> <p>Support evaluation at an APD geographic scale not project by project</p> <p>Engage landowners effectively</p> <p>Treat different basins differently including nature of needs and collaboration.</p>  | <p>We are working on edits to the public review policy to address the concerns and suggestions raised in this letter, specifically, recommending collaboration including recognizing the contributions agriculture has made to fish recovery.</p> <p>New policy R-648 responds to comments</p> |
| <b>Hahn, Jon and June, 16035 148<sup>th</sup> Ave NE Woodinville WA 98072</b>   |  |
| <p>We are concerned about reports locally of impending Woodinville-area zoning changes that would, in turn, lead to revisions of Woodinville's Urban Growth Boundary lines. And that, in turn, would lead to obvious developments that would surely ooze into and destroy the open, rural setting of the Sammamish Valley and surrounding hillsides, plateaus and wooded areas, wetlands and single-family dwellings.</p> <p>Please do not allow the Urban Growth Boundary (and related zoning) now in place to become a One-Size-Fits-All thing to be stretched whenever or wherever someone or something wants more growing space.</p>  | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>   |
| <b>Hsiao, Terence &amp; Karin</b>   |  |
| <p>I am writing with regard to the current proposal to move the Urban Growth Boundary in the Sammamish Valley. I urge you to support maintaining the current boundary for several reasons:</p> <ol style="list-style-type: none"> <li>1. The boundary was thoughtfully established over a multi-year process to serve the public interest and has done so.</li> <li>2. There is a process to change the boundary; the City of Woodinville has not followed the requirements of the process. The City of Woodinville has significant unrealized development opportunities which it has yet to take advantage of.</li> <li>3. The effort to change the boundary strikes me as little more than an effort to achieve private gain at the expense of the public interest.</li> </ol> <p>Once open space is gone, it is gone forever. The Sammamish Valley is a precious resource that we need to preserve. Thank you for being a steward for the resources of our area.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>   |
| <b>Hummer, Jonathan <a href="mailto:hummerinwa@yahoo.com">hummerinwa@yahoo.com</a></b>  |  |
| <p>A current proposal to move the Urban Growth Boundary in the Sammamish Valley threatens not only the productive farmlands in the Valley but also the future of the quality of life for our greater Woodinville community.</p> <p>I am writing to express my support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley. This is in response to ongoing efforts by a group to convince the County to move the UGB and pave the way for an unneeded expansion of the City of Woodinville deeper into the Valley.</p>   | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>   |

|   |   |
|---|---|
| <b>Hunt, Jan, <a href="mailto:janmaxwa@comcast.net">janmaxwa@comcast.net</a></b>  |   |
| Please do not support the city of Woodinville's incorporation of lands along 140th Ave NE/PI NE. The proposed development will adversely affect agriculture & the rural character in the Sammamish Valley. Increased multi-use businesses on those parcels will greatly increase traffic problems where corrections could be extremely difficult.   | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area |
| <b>Hiester, Steve, Stafford, Nancy, Eberle, Peter – Rural UAC Chairs<br/><a href="mailto:hies_skel@hotmail.com">hies_skel@hotmail.com</a>, <a href="mailto:mtcphe@msn.com">mtcphe@msn.com</a>, <a href="mailto:nancy@go2email.net">nancy@go2email.net</a></b>   |   |
| Our Rural Area UACs are concerned about a proposed move of the Urban Growth Boundary (UGB) in the Sammamish Valley to allow the City of Woodinville to annex several parcels. These parcels are along a rural road in the unincorporated Rural Area. They either abut the Sammamish Valley Agricultural Production District (APD) or include land within the APD.   | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area |
| <b>Hiester, Steve, Stafford, Nancy, Eberle, Peter – Rural UAC Chairs<br/><a href="mailto:hies_skel@hotmail.com">hies_skel@hotmail.com</a>, <a href="mailto:mtcphe@msn.com">mtcphe@msn.com</a>, <a href="mailto:nancy@go2email.net">nancy@go2email.net</a> (Continued)</b>   |   |
| <p>This appears to be a classic case of slowly changing zoning in a piecemeal fashion. We have complained about just such examples in the past citing conflicts with the State Growth Management Act, the Growth Management Planning Council's Countywide Planning Policies, and the King County Comprehensive Plan (KCCP).</p> <p>We strongly oppose such changes <u>or</u> setting of such precedents. Yet, all too often, we see these types of proposals surfacing up again and again in different parts of the County. As you can tell from past comments submitted by our Rural Area Unincorporated Area Councils (UACs), we do not like loopholes, special cases, sweetheart deals, spot-zoning, etc.</p> <p>Clearly, the City of Woodinville does not lack land capacity to meet its population and housing needs. In AZ-16 DDES Staff has done an excellent job of outlining this issue and delving into important details. We strongly support Staff's recommendation to deny this proposed change.</p> <p>During the King County Council's upcoming 2012 KCCP Update deliberations, should this proposal come before you, we urge you to shoot it down. This proposal is in clear violation of existing policies, sets a precedent, and is just plain wrong!</p> |   |

J

|  |  |
|--|--|
| <b>Johnson, Pamela A., (silvermoon) P.O. Box 236, Fall City, WA 98024</b>  |  |
| Supports the vision for the community developed during the 2012 update of the Fall City subarea plan, and supports a sewer system for the business district to protect the water quality of the river. | Comments support the recommended update of the Fall City subarea plan. |

# K

| <b>Keesling, Maxine, 15241 NE 153 Street, Woodinville, WA 98072</b>   |  |
|---|--|
| Points out the lack of discussion about private property rights in chapter 4 – Environment – in the comprehensive plan. Also points out that King County has no authority to increase public access to private shorelines and objects to King County's use of buffers to protect lakes, rivers, and marine shores.  | Existing policy I-101 states that King County's regulation of land should: a) protect public health, safety, general welfare, and property rights.   |
| <b>Keizer, Milton C., Joelle, and Colin, 4345 328<sup>th</sup> Place SE, Fall City, WA 98024</b>  |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above  | See response to Adcox - above  |
| <b>Kennedy, Richard, 18825 6<sup>th</sup> Avenue SW, Normandy Park, WA 98166-3978</b>   |  |
| <p>Policies that support cultural and historic preservation should be retained.</p> <ul style="list-style-type: none"> <li>• While the natural environment is woven throughout the plan, cultural resources and historic resources — which are <u>also</u> part of the environment — are missing from many areas (e.g., Chapter 1: Regional Planning and Chapter 4: Environment). Cultural resources and historic resources should be added to those areas.</li> <li>• There should be greater mention of the role of tourism in the economy of King County, and partnership with the organizations that manage landmarks, historic districts, museums and other cultural tourism opportunities (e.g., Introduction and Chapter 9: Economic Development).</li> <li>• A great deal of text has been lined out in Chapter 6: Parks, Open Space and Cultural Resources, including mention of support for cultural organizations. Support for cultural and historic organization should be retained or addressed elsewhere in the plan.</li> <li>• The definition of 'Green Building' (Chapter 2) should include the concept that the 'greenest' option is often the retention and remodeling of historic buildings.</li> <li>• The policies regarding historic preservation are not sufficiently robust in all sections of the plan. They need to be.</li> </ul> | <p>Agree</p> <p>The natural environment is rigorously addressed in the comprehensive plan.</p> <p>Comment acknowledged</p> <p>The plan strongly supports cultural resources.</p> <p>Comment acknowledged</p> <p>Comment acknowledged</p> |

|  |  |
|--|--|
| <b>Kelson, Barbara, <a href="mailto:barbara@applefarmvillage.com">barbara@applefarmvillage.com</a></b>   |  |
| <p>The City cannot demonstrate the need for additional commercially zoned property and we are, along with other local residents, opposed to the annexation of any of the remaining ag or RA zoned land in the valley. We encourage the City of Woodinville to recognize and respect the scarcity and unique value of the land in the Samammish Valley. We support the current agricultural zoning and ask that the City of Woodinville would join with King County, and many other local citizen groups and individuals to ensure that farming continues in the Samammish Valley.</p> <p>Please tell the City of Woodinville that the remaining land outside the urban growth boundary in the Samammish Valley is not available for commercial development.</p>  | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |
| <b>Kellogg, Charlie, <a href="mailto:chkellogg@centurytel.net">chkellogg@centurytel.net</a></b>  |  |
| <p>I Support the draft 2012 King County Comprehensive plan as written.</p>   | <p>Comment Acknowledged</p>  |
| <b>Koetje, Randy, Woodinville, WA 98072</b>  |  |
| <p>I strongly agree with the analysis set forth in the King County staff report recommending that the current UGA boundary be preserved. It is very important to preserve the integrity of the well-considered planning policies behind the UGA. As the staff report notes, the City of Woodinville has made no attempt to justify the requested boundary changes under the applicable Countywide Planning Policy FW-1. If the County establishes the precedent of making piecemeal changes to the UGA for the benefit of individual parcels simply to pave the way for future development, the UGA becomes meaningless as a long-term planning protection for the rural area.</p> <p>The bar should be set high for changes to the UGA, and revisions should only be made when the planning criteria for a UGA amendment are clearly demonstrated. One of the main grounds for evaluating potential UGA amendments under Policy FW-1 is whether there is sufficient developable and redevelopable land within the UGA boundary. The attached table from the City of Woodinville's 2009 Comprehensive Plan states that there are over 140 acres of developable or redevelopable commercial and industrial land within the City of Woodinville. The whole point of the UGA is to direct future commercial and industrial development to those lands, within the UGA, rather than sprawling for no particular reason into the rural area.</p> <p>I urge the Council to reject this amendment, and preserve the integrity of the UGA planning process as an essential protection for our rural area</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |

|  |  |
|--|--|
| <b>Konigsmark, Ken, <a href="mailto:kenkonigsmark@yahoo.com">kenkonigsmark@yahoo.com</a></b>   |  |
| <p>I understand the City of Woodinville is proposing to move the UGA boundary to enable several rural parcels to be brought into their jurisdiction. These parcels abut a rural road in the unincorporated Rural Area and further either abut the Sammamish Valley APD or include land within the APD.</p> <p>The APD has been protected for decades for very good reasons. These parcels should NOT be considered for inclusion inside the UGA nor for any type of urban development. As in past, similar proposals, allowing piecemeal manipulation of the UGA to benefit specific landowners creates a horrible precedent that would impact the entire Rural Area of King County. Allow movement of the UGA here and there will be demands from all over the county by owners and cities that want similar treatment.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |
| <b>Konigsmark, Ken, <a href="mailto:kenkonigsmark@yahoo.com">kenkonigsmark@yahoo.com</a> (Continued)</b>   |  |
| <p>Any action to shift the UGA here would be in direct contradiction with the State Growth Management Act, the Growth management Planning Council's Countywide Planning Policies, and the King County Comprehensive Plan (KCCP). I strongly oppose any consideration for this proposal. This proposal is in clear violation of existing policies and would set a horrible precedent for King County's rural area.</p>  |  |

L

|   |   |
|---|---|
| <b>Lavender, Terry, 17304 208th Ave. N.E., Woodinville, WA 98077</b>  |   |
| <p>The staff report regarding the Sammamish Valley UGA Area Zoning Study is excellent. I can't articulate the arguments any more clearly and urge you to reject the request to rezone any of these properties. It is too bad time has to be spent doing this over and over when none of the arguments have changed and there hasn't even been an effort on the part of the City of Woodinville to justify a change. Protecting our rural and agricultural areas - especially where they abut urban areas - is critically important.</p>   | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>  |
| <b>Lewis, Peter, Mayor, City of Auburn, 25 West Main Street, Auburn, WA</b>   |   |
| <p>All relevant policies pertaining to the current Transfer of Development Rights program are written in a manner and with appropriate performance standards and measurements to ensure that this program's results in community beneficial and supportive density transfer.</p> <ul style="list-style-type: none"> <li>• density transfer efforts should be prioritized to existing designated urban centers. The City of Auburn is available to work with King County to explore potential density transfers to its designated urban center.</li> <li>• density transfers into potential annexation areas should only occur when there is substantive and demonstrated evidence that an adequate level of infrastructure and amenities exists to support additional housing units and persons as supported by the assigned municipalities for the affected potential annexation areas.</li> </ul> | <p>KC looks forward to working with the City on potential TDR into Auburn's Urban Center; and to make the Auburn Urban Center <i>the</i> priority for TDR in this part of the county.</p> <p>Over the last 10 years a total of 16 TDRs have been transferred into development projects in Auburn's PAA. These 16 TDRs represent 18 additional units built through the use of TDR in Auburn's PAA.</p> |

| <b>Lewis, Peter, Mayor, City of Auburn, 25 West Main Street, Auburn, WA (Continued)</b>   |   |
|---|---|
|   | <p>These stats give a sense of the issue attributable to TDR in Auburn's PAA – that is, TDR is not the driving force behind development that may be out of sync with available infrastructure in Auburn's PAA.</p> <p>The county is committed to maintain the application of TDR in its unincorporated urban areas/PAA's; but do so in ways that are both equitable to non-urban center neighborhoods, and makes these neighborhoods better places to live.</p> |
|   | <p>In this context the county will amend the currently proposed policies to reflect: (1) the need to develop, with cities, design guidelines for their respective PAA's; and (2) use of TDR amenity funds in urban unincorporated areas/PAA's after a certain scale or amount of TDRs are used in that particular area similar to the amounts of TDR negotiated into TDR ILAs with cities wherein TDR amenity funds were applied.</p>                           |
| <b>Lewis, Glen and Barb, 32858 SE 47<sup>th</sup> Place, Fall City, WA 98024</b>  |   |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above  | See response to Adcox - above   |
| <b>Liebe, Joe, 33306 SE 44<sup>th</sup> Place, Fall City, WA 98024</b>  |   |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above  | See response to Adcox - above   |
| <b>Long, Bill and CJ, 13319 160<sup>th</sup> Ave NE, Redmond WA98052</b>  |   |
| We urge King County to maintain the Sammamish Valley Urban Growth Boundary line and require any proposed changes to that line, or to the Sammamish Valley Agricultural Protection district, follow the established rules and guidelines for such change. We also request that the spirit of those requirements be carried into the 2012 Comprehensive Plan. | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area   |



|   |  |
|---|--|
| <b>Limarzi, Gary and Sharon, <a href="mailto:glimarzi@hotmail.com">glimarzi@hotmail.com</a></b>   |  |
| <p>A current proposal to move the Urban Growth Boundary in the Sammamish Valley threatens not only the productive farmlands in the Valley but also the future of the quality of life for our greater Woodinville community.</p> <p>I am writing to express my support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley. This is in response to ongoing efforts by a group to convince the County to move the UGB and pave the way for an unneeded expansion of the City of Woodinville deeper into the Valley.</p>   | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |
| <b>Lund, Richard, 14148 Bear Creek Rd NE, Woodinville, WA 98077</b>   |  |
| <p>I strongly agree with the analysis set forth in the King County staff report recommending that the current UGA boundary be preserved. It is very important to preserve the integrity of the well-considered planning policies behind the UGA. As the staff report notes, the City of Woodinville has made no attempt to justify the requested boundary changes under the applicable Countywide Planning Policy FW-1. If the County establishes the precedent of making piecemeal changes to the UGA for the benefit of individual parcels simply to pave the way for future development, the UGA becomes meaningless as a long-term planning protection for the rural area.</p> <p>The bar should be set high for changes to the UGA, and revisions should only be made when the planning criteria for a UGA amendment are clearly demonstrated. One of the main grounds for evaluating potential UGA amendments under Policy FW-1 is whether there is sufficient developable and redevelopable land within the UGA boundary. The attached table from the City of Woodinville's 2009 Comprehensive Plan states that there are over 140 acres of developable or redevelopable commercial and industrial land within the City of Woodinville. The whole point of the UGA is to direct future commercial and industrial development to those lands, within the UGA, rather than sprawling for no particular reason into the rural area.</p> <p>The City of Woodinville's effort to promote a Tourist District is good for the economic development of our area, and I wish them well. But at this point, there is no basis for granting piecemeal exceptions to allow that development to encroach on the protected rural area. It is simply not necessary for economic development, and would set a very bad precedent of ignoring the planning criteria for UGA amendments.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |

M

|   |  |
|---|--|
| <b>Maas, Shirley and Norman R., 4346 328<sup>th</sup> Place SE, Fall City, WA 98024</b>   |  |
| <p>All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above</p>   | <p>See response to Adcox - above</p>   |
| <b>Mattson, Matt, Snoqualmie Tribal Administrator, P.O. Box 969, Snoqualmie, WA 98065</b>   |  |
| <p>Concerned that code has not been drafted – in absence of code prefer no change in policy</p> <p>Propose multi-objective planning process include Forums, Ag Commission, Flood District, King County and others working together across whole basin</p> <p>Include Snoqualmie Tribe in future process</p> | <p>Code will be amended (KCC21A.24.381)</p> <p>Snoqualmie Tribe will be included in multi-stakeholder planning process</p> <p>New policy R-648 responds to comments re. planning process</p> |



|  |  |
|--|--|
| <b>McLean, Marty and Jan, 33322 SE 43<sup>rd</sup> Street, Fall City, WA 98024</b>   |  |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above   | See response to Adcox - above  |
| <b>Madzola, Eugene, <a href="mailto:madzola@aol.com">madzola@aol.com</a></b>   |  |
| <p>The current proposal to move the Urban Growth Boundary in the Sammamish Valley is not in the best interest of our community. The proposal threatens not only the productive farmlands in the Valley but also the future of the quality of life for our greater Woodinville community.</p> <p>I am writing to express my support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley.</p>  | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area  |
| <b>Martin, Larry, Hollywood Hill Association, <a href="mailto:LarryMartin@dwt.com">LarryMartin@dwt.com</a></b>   |  |
| The GMA, CPP's, and the KCCP mandate a rigorous process to determine whether a change to the UGA is warranted. Woodinville's proposal is unsupported by the facts or the law. The County has rejected several similar proposals over the years. The need to expand the UGA has not been established and cannot be justified because the requisite criteria have not and can not be met. This proposal must be rejected.  | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area  |
| <b>Mickelson, Beth, <a href="mailto:bethmickelson@comcast.net">bethmickelson@comcast.net</a></b>   |  |
| Opposes the proposal to move the urban Growth Boundary in the Sammamish Valley.  | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area  |
| <b>Michalak, Julia <a href="mailto:jmichalak@gmail.com">jmichalak@gmail.com</a></b>  |  |
| As for the species list, I don't know a ton about individual species in the County. I assume that your assessment of those listed is fine. It did occur to me that the Northern Flying Squirrel and the Western Toad might be ones to add. I don't know what justification you need in order to add species (or what the County's criteria are). However, those species are present in King County and are sensitive to urbanization and fragmentation (the squirrels prefer old-growth forest or at least older forest and the toads have been declining in the Puget sound lowlands - according to the WA Connectivity Working Groups species assessments). I'm not adamant about that, but, it's something to consider. | The Western Toad is a state Candidate species and therefore its habitat is protected under policy E-418h.  |
| Suggests adding "spatially explicit" to language in policy E-307c.   | Regarding the flying squirrel, according to references cited in WHCWG 2010*, northern flying squirrels are generally found in forests with multi-layered mid and over-story canopies, low to moderate amounts of understory, and few canopy gaps, and although these characteristics are typically found in mature and old-growth forests, they can also be found in some younger forests. |

**Michalak, Julia** [jmichalak@gmail.com](mailto:jmichalak@gmail.com) (Continued)

Suggests adding “ecological communities” to policy E-401.

Suggests adding “and others conservation planning stakeholders” to E-402.

Regarding policy E-404, she says “The county should also coordinate with existing eco-regional planning efforts – so as to not duplicate efforts and to coordinate conservation actions with other actors.”

Suggests adding “and to enhance resilience” to policy E-405a.

Regarding policy E-413a, suggests changing new word “predictions” into “considerations.” She says: “If there is compelling evidence to do so. To me, this suggests assisted migration. I think considerations is more ambiguous. Also, following predictions may not be the best approach to climate adaptation planning.

The species is a good focal species for designing connectivity corridors; however, it is not known to be in decline in King County, nor is it a WDFW PHS species.

(\*Washington Wildlife Habitat Connectivity Working Group (WHCWG). 2010. Washington Connected Landscapes Project: Statewide Analysis. Washington Departments of Fish and Wildlife, and Transportation, Olympia, WA.)

Done

Done

Done

Additional text has been added before policy E-404 to reflect the support for collaborating with other planning efforts as they arise.

Done

Predictions” has been changed to “considerations” to capture a broader array of information input types. Taking climate change into consideration should be done for a great many planning processes and should not imply or suggest any specific outcome

**Miller, Richard A**

I believe that the 2012 comprehensive plan should transfer density from areas that don't reflect the spirit of the overall plan to areas that match the goals of the plan to a greater extent. The current plan allows for higher density in areas not served by tier one or tier two streets.

There are areas in North Highline that are served by higher tiered streets which are closer to all levels of public schools, public transportation, parks, and have sidewalks to facilitate pedestrian traffic yet are zoned for vastly lower density compared to areas that don't meet these criteria.

The five-tiered road service level framework is not intended to be a determinant of existing or future land use designations. The new service levels for King County roads have been developed to guide road maintenance, preservation and improvement priorities, not to serve as criteria for location of residential density. With no new revenue on the horizon, the Road Services Division developed the tiered approach to help manage its declining road system with available funding.

Roads were assigned to tiers according to their function and importance to the performance of the overall road network. Road Services analyzed every road in the network using a number of factors, including the road's classification, traffic volumes, the projected length of detours, and equity and social justice issues as well as whether the road is sole access, a lifeline route, or important in maintaining transit.

We are not proposing to transfer density from one urban area to another based on the county's road tier designations

**Moderow, Lee, President & Commissioner, Fall City Metropolitan Park District,  
P.O. Box 1180, Fall City, WA 98024**

Comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above

A second submittal includes a letter and lengthy attachment about local parks in the Fall City Area:

The FCMPD Board concludes from its review of the County's proposed changes to Chapter 6, Parks, Open Space and Cultural Resources of its Comprehensive Plan that King County will continue to be the provider of local park, trails and open space lands in the unincorporated rural area. This assertion is consistent with the Growth Management Act (GMA) which states that counties are the providers of regional services and local rural services.

The FCMPD Board concurs with the proposed changes made to Parks policy 101 (P-101) that states:

*For the purposes of the King County open space system, "Regional Parks" shall mean sites and facilities that are large in size, have unique features or characteristics, significant ecological value and serve communities from many jurisdictions, and "local" shall mean sites and facilities that predominantly serve communities in the rural unincorporated area.*

The FCMPD Board concurs with the proposed changes made to Parks policy 103 (P-103), (with clarifying word "provide" added) that states:

*King County shall provide local parks, trails, and other open spaces in the Rural Area that complement the regional system. King County should provide (text added) local parks, trails, and other open spaces in each community in the Rural Area to enhance environmental and visual quality and meet local recreational needs.*

The FCMPD Board asserts that based upon the two aforementioned and proposed changes to county comprehensive plan policies, King County has an obligation to, and shall remain, the provider and maintainer of parks and recreational facilities in the unincorporated rural areas, including Fall City.

See response to Adcox – above

Comments acknowledged. King County remains the local service provider for unincorporated King County, including Fall City and the surrounding Rural Area.

|   |  |
|---|--|
| <b>McCroskey, Lauren</b> <a href="mailto:dixiedingo@q.com">dixiedingo@q.com</a>   |  |
| <p>Policy U-207i in the Urban Chapter and CP-304 in the Enumclaw section of the Community Plan Chapter advocate, but do not require, protection for landmarks that are no longer under KC governance due to transfer or annexation. Protection of KC landmarks should be mandatory</p> <p>Require nominations of potential landmark properties prior to consideration under SEPA, similar to the City of Seattle procedures.</p>  | <p>The time of annexation or transfer or property is not the time to be requiring protection of KC landmarks. The protection should be assured through approval of ILAs prior to any change in governance.</p> <p>Comment noted.</p> |
| <b>Meusey, Jim,</b> <a href="mailto:jimmeusey@frontier.com">jimmeusey@frontier.com</a>  |  |
| <p>Please consider this before allowing a pathway for additional development/destruction east of Woodinville. We have many watersheds, wetlands, salmon and other wildlife habitats that will be destroyed by construction, paving, traffic, and chemical and noise pollution. We have substantial local farmlands that will be driven to close by increased taxation and unfair property valuation. The people of this region have voted again and again to not allow incorporation. The current Urban Growth Boundaries were established to help maintain the resources that exist here. Don't allow a few developers and their money to push this issue forward.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>   |

N

|  |  |
|--|--|
|  |  |
|  |  |

O

|  |                               |
|--|-------------------------------|
| <b>Olson, Judy, 4531 332 Avenue SE, Fall City, WA 98024</b>  |                               |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above | See response to Adcox - above |

P

|  |                               |
|--|-------------------------------|
| <b>Parker, J.C. and Lori, 33116 SE Issaquah-Fall City Road, Fall City, WA 98024</b>                                  |                               |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above | See response to Adcox - above |

|  |   |
|--|---|
| <b>Paulson, Dennis, 1724 NE 98<sup>th</sup> Street, Seattle, WA 98115</b>  |   |
| <p>He recommends being consistent in capitalization of common names of species throughout the groups, and notes that even within the birds it's not consistent.</p> <p>Suggests that some species that are on the list, especially the seabirds, probably don't warrant being on it, as they are widespread and common and part of large populations spread over a much larger region.</p> <p>He writes: "I guess I think that the county has enough on its hands already trying to protect major habitat types and specific rare species, but of course any added protection that might come from concern over Surf Scoters or Purple Finches is great."</p> <p>Recommends adding Pika and deleting the deer (an abundant large mammal)</p> <p>Suggests adding: Green Heron, Northern Goshawk, Merlin, Common tern, Rhinoceros Auklet, Western Screech-Owl, Common Nighthawk, Purple Martin, Red-eyed Vireo, and Bullock's Oriole.</p> <p>Recommends adding Pacific Giant Salamander, Ensatina, Western Redback Salamander, Western Toad; all have declined in recent years, presumably for some of the same reasons causing worldwide amphibian declines</p> | <p>Have made changes to try to be more consistent</p> <p>The seabirds are currently being retained as Species of Local Importance, as they may potentially be impacted by local water quality or forage fish populations.</p> <p>Pika has been added. Deer are currently retained, as they are a PHS species.</p> <p>After additional discussion with Mr. Paulson about our criteria for inclusion, we have added Green Heron, Red-eyed Vireo, and Bullock's Oriole to the list.</p> <p>Western toad is covered as a candidate species in policy E-418g.</p> <p>Pacific Giant Salamander, Ensatina, Western Redback Salamander have been added to the list.</p> |
| <b>Peloza, Bill, Councilmember, City of Auburn and Marla Mhoon, Councilmember, City of Covington Co-chairs, WRIA 9 Watershed Ecosystem Forum</b>   |   |
| Proposed that WRIA 9 and other salmon groups who have local knowledge work together to restore habitat and preserve agriculture  | New policy R-648 responds to comments   |
| <b>Peterson, Kelly, City of Kent, 220 Fourth avenue South, Kent, WA 98032</b>  |   |
| <p>T-115b If King County is talking about transit service, Kent is concerned. There is no reason that a bus service should continue on forever just because the bus has run there in the past. Perhaps these routes have become inefficient. Land use changes in the communities could result in much more transit-friendly layout and could be a more effective and efficient use of those transit hours. How is a growing community to ever get new transit service under such a rule as this?</p> <p>Under the section "C-Public Transportation" on pages 7-21 and 7-22, the City is concerned that there was no mention about the public transit responsibility to serve the disadvantaged populations (equity and social justice, not to mention people with physical disabilities).</p>  | <p>The policy is not intended to prohibit these types of route adjustments. Policy T-115b has been revised for clarification in response to this comment.</p> <p>Equity and social justice issues are a high priority for King County and are emphasized throughout the chapter. See Chapter introduction text as well as T-115c and T-401e for examples.</p>   |

|   |  |
|---|--|
| <b>Pasley, Dallas and Ann, 13838 –162nd Ave. N.E., Woodinville, Wa 98072</b>  |  |
| <p>We wish to go on record as being opposed to moving the UGB in the Sammamish Valley adjacent to Hollywood Hill. Similar proposals have been appropriately turned down by the County in the past.</p> <p>A proposal to move the UGB in the Sammamish Valley threatens our ability to protect our neighborhood as well as farms, forests and Rural neighborhoods across Rural King County from urban sprawl. It is our hope this will again be turned down by the County at the update process</p>  | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |
| <b>Pyles, Bob and Linda,</b>  |  |
| <p>Please vote to reject Motion #13475 to move the Urban Growth Boundary in the Sammamish Valley. These changes are contrary to the intent of both the Growth Management Act and especially the Farmland Preservation Bond Issue. The fact that some property owners opted out of the purchase of development rights does not change the intent of the citizens of this area to keep the Sammamish Valley an agricultural area and we ask that the elected representatives of the County follow those long held wishes of local residents and vote against this motion.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p> |

# R

| <b>Reed, David, <a href="mailto:david@davidreed.com">david@davidreed.com</a></b>  |  |   |
|---|--|---|
| <p>(Proposed) "CP-9xx King County reaffirms the spirit and intent of the Mediated Agreement reached March 16, 2009, between the County, the City of Snoqualmie and the Lake Alice Community Association that the roadway at the end of Sorenson Street in the City of Snoqualmie shall not be opened up to connect with Lake Alice Road, unless King County, the City of Snoqualmie, and the Lake Alice Community Association so agree. This Agreement is an important piece for harmony between the adjoining areas and for preserving the rural character of the Lake Alice community."</p> <p>We hope you will adopt this proposal as part of the Plan Update.</p> |  | <p>Comment acknowledged. Existing KCCP policy CP 928 addresses this issue.</p>  |
| <b>Ryon, Richard, 45028 SE Tanner Road, North Bend, WA 98045</b>  |  |   |
| 3.6   | Omit the old 2 <sup>nd</sup> Para. It is replaced by the new 2 <sup>nd</sup> Para. | 3.6: will do  |
| 3.7   | Reinstate names of UACs in 2 <sup>nd</sup> Para. Useful to know them.              | 3.7: Can list the UACs as they will continue to exist for at least some of the life of the 2012 Comp Plan revision (although no longer recognized as "official public engagement organizations" by the county). |



| <b>Ryon, Richard, 45028 SE Tanner Road, North Bend, WA 98045</b>   |  |
|--|--|
| <p>3.14 Not certain what “Rural Forest Focus Area” is. If intension is to isolate certain land ownerships for protection, this could be seen as a “taking” issue.</p> <p>3.16 Identifying &amp; preserving “equestrian trails” across private land clearly a taking issue. See Discussion above.</p> <p>3.17 Same as in 3.16 above. Mention of preserving “trails” on private land</p> <p>3.18 R-214 “links” cannot be preserved without creating easements with landowners. You are encouraged to please be careful here.</p> <p>3.19 R-217 Retaining “links” is a degrading of land value. Owners must be compensated.</p> <p>3.22 Re: Clustering. A 1 sq. mi. cluster in RA5 is equal to 128 residences. This is not a Rural environment, no matter how much Open Space is created. Delete 1 Mile Cluster.</p> <p>3.27 R-316(a) – Still not clear what a Rural Forest Focus Area is. Can a Rural Forest landowner be “targeted” to sell their TDRs? Or is this an elective option by the landowner?</p>   | <p>3.14 and 3.27: Rural Forest Focus Areas are areas with rural zoning that are in large parcels and are predominantly forested. They were identified as areas where the county should focus incentives and technical assistance. There are no additional regulatory requirements for RFFAs, and the zoning is RA-5 or RA-10 like the rest of the Rural Area. TDR is an elective option by the landowner.</p> <p>3.16, 3.17, 3.18: Nothing in the policies requires landowners to retain trails or links.</p> <p>3.22: There is no reference to a one mile cluster</p> |
| <p>3.30 R-319(b) – What is KCCP definition of “threatened”? Threatened from what or who?</p> <p>3.60 R-629 Small or Micro Hydroelectric is permitted in FR and should be exempted in this paragraph.</p>   | <p>3:30: the reference here is meant to imply threatened from development. Will add this clarifying language.</p> <p>3:60 Policy language would not affect small scale hydro facilities.</p>   |
| <b>Richardson, Jodi, 16718 171<sup>st</sup> PI NE Woodinville, WA 98072</b>  |  |
| <p>I am a resident of unincorporated King County, living outside of the Woodinville city limits. I am deeply concerned about the proposal being made to move the Urban Growth boundary in the Sammamish Valley. This proposal is a threat to the quality of life that is highly valued in the greater Woodinville community. It threatens the farmlands and open spaces, which make our area such a desirable place to live and also make it an increasingly desirable tourist destination.</p> <p>The Growth Management Act, the King County Comprehensive Plan and the Countywide Planning Policies are clear in their support for defending designated Rural areas and Agricultural Resource Lands specifically from development that is inconsistent with the long-term preservation of the values that these lands contribute to our regional well being.</p> <p>The proposal to move the UGB in the Valley adjacent to Woodinville would put all of this in jeopardy. I urge you to resist and oppose this proposal. Please maintain the current UGB in the Sammamish Valley. Woodinville does not need to expand.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>   |

**Richardson, David, 16718 171<sup>st</sup> PI NE Woodinville, WA 98072**

Excerpt from a letter from the future: Over time, what was left of the Sammamish valley became like one continuous city from Bothell to Redmond. Population density increased. This brought increased traffic and noise. Run-off into creeks and streams increased. Clean air and forested areas decreased, along with small local farms that had shown so much promise. It was a short term gain for a few with consequences for the many that changed the valley forever and crowded out what people once thought they had protected. None of this would have happened if King County had been steadfast in maintaining the Urban Growth Boundaries and been true to the spirit of the GMA and their own Comprehensive Plan.

Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area

**Rimbos, Peter, Greater Maple Valley UAC**

When a jurisdiction (e.g., Black Diamond) ignores PSRC growth targets and overburdens the KC road system, how is it accounted for in the TNR?

In addition to the regionally adopted growth targets, the traffic forecast for the 2012 King County Comprehensive Plan update did take into account the higher growth assumptions of Black Diamond's Comprehensive Plan and the proposed new master planned developments (MPDs). No capacity deficiencies on unincorporated King County roads were identified in this analysis. Potential operational deficiencies, such as needs for signalization or intersection improvements, would require more detailed traffic studies that would not be part of the Comprehensive Plan process. Detailed studies of the impact of the MPDs on roads within and outside the city were required as part of the city's SEPA process for the developments

Also note that the growth targets are not a forecast, neither are they a limit. Instead they are a policy statement of the Growth Management Planning Council expressed in numbers. The targets are established to ensure that King County and its cities can collectively accommodate the state Office of Financial Management's population forecast. For some jurisdictions, the targets diverge from actual expected growth. King County does not have the authority to control the growth of other jurisdictions nor mandate a new regional process.

## Rimbos, Peter, Greater Maple Valley UAC (Continued)

|   |  |
|---|--|
| There appears to be a strong disconnect between high-level planning forecasts for the Comprehensive Plan update and the detailed forecasts done for the Black Diamond MPDs.   | The traffic forecasting for the 2012 King County Comprehensive Plan update is a high-level planning forecast and as such is not intended to address the detailed impacts of specific developments. The SEPA analysis for developments is supposed to provide a much higher level of detail upon which to base on-the-ground decisions about the development and associated roads operational issues  |
| The GMVUAC does not concur that additional capacity be added to the designated "Rural Regional Corridor" Issaquah-Hobart Rd.  | Comment noted. This roadway meets the criteria established in policy T-203b.   |
| T-205a is logical and understandable from a KC budgetary standpoint, but KC then loses any Transportation Concurrency evaluation capability when evaluating permits for urban-serving facilities, such as Schools, Stormwater Detention Ponds, etc. sited in the Rural Area.  | Comment noted. This policy is consistent with the GMA intent that urban services be provided by cities rather than counties. It is also consistent with Countywide Planning Policy DP-28.  |
| <p>The following references in T-322 are good and should be included in other applicable chapters as well.</p> <p>"Natural and historic resource protection should also be considered. Particular care should be taken to minimize impacts where the location of such facilities could increase the pressure for development in critical areas or rural or resource lands"</p> <p>In T-205 "Any segment of a county roadway that forms the boundary between the Urban Growth Area and the Rural Area shall be designed and constructed to urban roadway standards on both sides of such roadway segment." Who pays for the development of the roads? And How is the 6-year lag time considered?</p> <p>Ensure real transportation coordination is achieved by requiring a Transportation Impact Statement (TIS) be prepared at earliest stages of proposed projects by King County Departments to evaluate and report direct and indirect impacts of their proposed projects on all local roads and thoroughfares." Such a TIS could be akin to an Environmental Impact Statement (EIS). A TIS should be developed at the earliest stages of proposed projects.</p> | <p>Comment noted. These concepts are touched on in other chapters.</p> <p>Policy T-205 clarifies that roads forming the boundary of the UGB should be fully included in the Urban Area and is intended to specify that when an urban boundary road is improved, urban road standards will be used on both sides of the road (as opposed to urban standards on one side and rural standards on the other). It is not intended to imply that all boundary roads will be proactively retrofitted to urban standards.</p> <p>Who pays for any future improvements would depend on the improvements. Typically if the improvements are required due to adjacent development, then the developer would bear the cost. Otherwise road improvement projects are usually paid for by the jurisdiction that owns and manages the road.</p> |

## Rimbos, Peter, Greater Maple Valley UAC (Continued)

|  |  |
|--|--|
|  | <p>Policy T-205 is not associated with transportation concurrency, it just specifies whether urban or rural road standards will be used. Therefore, there is no relationship to the 6-year timeframe associated with concurrency.</p> <p>Comment noted.<br/>Transportation impacts are addressed through the SEPA process and through traffic impact analyses.</p> |
| R-303 Keep existing references to Transportation Concurrency   | Comment noted.   |
| R-325a Schools should be subject to Transportation Concurrency because of their impact during the morning commute.   | King County's adopted transportation concurrency testing methodology only evaluates the PM peak period. This time period was determined to have the heaviest congestion on the most roads. This is a common approach among many jurisdictions.   |
| T- 205a By encouraging county road right-of-way adjacent to or within cities to be annexed to that city, the County loses the ability to test for transportation concurrency on those roads when evaluating permits for Urban Area serving facilities. | Comment noted. This policy is consistent with the GMA intent that urban services be provided by cities rather than counties. It is also consistent with Countywide Planning Policy DP-28.  |
| T-209 The LOS F standard for certain minor residential and commercial developments, along with certain public and educational facilities will permit schools and gridlock in Rural Areas.  | This limited provision is provided to allow small development with minor impact to move forward in the development process and to facilitate essential public services. Note that public high schools in the Rural Area must still meet the LOS B standard.  |
| The County should eliminate the 6 year time lag loophole for transportation infrastructure to catch up with development, so that proposed new development is evaluated against existing infrastructure.  | The six year timeframe is consistent with the Growth Management Act. "Concurrent with the development" is defined by the GMA to mean that any needed "improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years." RCW 36.70A.070(6)(b).           |

| <b>Rimbos, Peter, Greater Maple Valley UAC (Continued)</b>   |  |
|--|--|
| In the statement "Portions of certain highways of statewide significance that do not have limited access and function like county arterials may be included in the King County concurrency test," change the word "may" to "shall".  | Comment noted. The county's adopted Transportation Concurrency Management program uses portions of all such roadways that are not limited access and function like county arterials.   |
| T-216 If a travel shed is passing the concurrency test, then any development proposal in that travel shed meets concurrency. The development in question should be added to the travel shed, and then a new concurrency test should be conducted to gage the impact. .   | Any issues with automatic concurrency compliance in travel sheds that pass the concurrency test are offset by annual concurrency testing and update to the concurrency map. All development proposals must still go through the required SEPA and permit review process, which includes additional analysis and potentially mitigation, before approval. |
| T-219 This policy on Transfer of Development Rights may be in conflict with Policy R-321b with regard to using TDRs from the TDR Bank outside the travel shed that has the receiving site.   | The use of TDR to meet concurrency requirements is allowed in the Rural Area of failing travel sheds to enable small scale (four lots or less) residential development. The sending and receiving sites must be in that <u>same</u> travel shed, resulting in no overall net impact to the travel shed. Policy R-321b has been revised to clarify this.  |
| <b>Rosenfeld, Michael and Luanne, 15905 NE 135<sup>th</sup> Street, Redmond, WA 98052</b>  |  |
| <p>We are residents of Grousemont Estates, and would like to register our objections to Woodinville's motion 13475. We support the maintenance of the current comprehensive plan land use designations and zoning on the ten parcels and two tracts referenced in motion 13475.</p> <p>We do not believe the City has adequately studied the issue and has not made an adequate case to support a change to the land use designations. More importantly, there is ample land available for commercial development in the Sammamish Valley south of Woodinville. The Woodinville Wine Village remains undeveloped. In addition, there are numerous vacant parcels in the area already designated as urban.</p> <p>We have read, and agree with the comments provided by the Hollywood Hill Association.</p> | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area  |

## Ross, Brian, Yarrow Bay

|  |   |
|--|---|
| <p>Revised Table DP-1 shows a Housing Target of 1,900 net new units and Employment Target of 1,050 net new jobs for the City of Black Diamond.<sup>1</sup> These targets are outdated and do not reflect the amount of growth that has been permitted and approved in Black Diamond for the next twenty years. In September 2010, the Black Diamond City Council unanimously approved MPD Permits for The Villages and Lawson Hills, which include 6,050 new residential units and 1.165 million new square feet of commercial development. Moreover, in December 2011, the Black Diamond City Council approved Development Agreements for The Villages and Lawson Hills under which the 6,050 new homes and the 1.165 million of commercial square footage will be developed for the next 15-to-20 years.</p> <p>King County's Comprehensive Plan Growth Targets are admittedly just <u>targets</u>. The County's proposed targets are a floor, not a ceiling, establishing the minimum amount of growth cities should plan for in order to absorb their share of King County's total growth. Numerous other King County cities have previously exceeded the County's target rates. Nevertheless, to the extent the County uses these numbers "as a guide for future planning of land uses and decisions on services and infrastructure"<sup>2</sup>, when planning is predicated on outdated and artificially low targets, it is predestined to be off base.<sup>3</sup> In order to plan effectively, King County's growth targets for Black Diamond in Table DP-1 should be revised to accurately reflect approved growth.</p> | <p>The current set of growth targets, including Black Diamond's 1,900 housing units and 1,050 jobs, was approved by the GMPC in 2009 and ratified by King County's jurisdictions in early 2010.</p>               |
| <p>County staff proposes to include the following new sentence to Policy U-187: "Drainage facilities to support the urban development shall be located within the urban portion of the development."<sup>4</sup> Yarrow Bay objects to and is concerned with this proposed addition because it fails to recognize and/or include consideration of environmental logistics and/or conditions that make siting certain facilities in rural areas the environmentally optimal location and may have the unforeseen consequence of preventing the using of low impact development techniques.</p>  | <p>Policy U-187 applies only to the King County Four to One Program, calling for drainage facilities serving the Urban portion of a Four to One project proposal to be included within the Urban Growth Area.</p> |
| <p>On page 3-44 of the Proposed 2012 King County Comprehensive Plan Amendments Public Review Draft dated October 7, 2011, the Comprehensive Plan includes a reference to Black Diamond as a "rural" city. This reference is an inaccurate holdover from the days when Black Diamond was an island city within the rural area and not contiguous to other urban areas.</p>  | <p>The term rural city comes from Vision 2040 and the Countywide Planning Policies; it is used in the King County Comprehensive Plan in the interest of consistency.</p>  |
| <p>County staff proposes to delete the following phrase from Policy T-203: "...except for segments of certain arterials that pass through rural lands to serve the needs of urban areas."<sup>5</sup> Yarrow Bay objects to and is concerned with this deletion for two reasons. First, it fails to recognize and/or include consideration of environmental logistics and/or conditions that make siting certain segments of arterials in rural areas the environmentally optimal location. And, second, it fails to create an exception for right-of-way that may have already been dedicated to the County for such road segments that were authorized by the existing King County Comprehensive Plan.</p>   | <p>The language deleted from policy T-203 was moved to a new policy T-203b.</p>   |

# S

|   |   |
|---|---|
| <b>Seaton, Allen W. and Lucille C., 4463 332<sup>nd</sup> Avenue SE, Fall City, WA 98024</b>  |   |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above<br><br>Also sent an additional comment stating there should be no more development, housing, or business in Fall City.   | See response to Adcox – above<br><br>Comments acknowledged.   |
| <b>Shea, Tom, P.O. Box 200, Snoqualmie, WA 98065</b>  |   |
| Concerned about flooding in the area of the Snoqualmie Mill, and asks why the County is turning over responsibility for land use in this area to the City of Snoqualmie.  | The Snoqualmie Mill was designated as the City of Snoqualmie's Potential Annexation Area under the Growth Management Act and is therefore appropriate to be annexed by the City and subject to all city regulations, including flood regulations.   |
| <b>Sheldon, Melvin R. Chairman, Tulalip Tribe</b>   |   |
| Clear statement of specific legal obligation re. King County's legal obligation for ESA recovery (no take);<br><br>Define terms clearly   | New policy R-648 responds to comments   |
| <b>Sundberg, Charlie, King County historic Preservation Program</b>   |   |
| Amend R-316 to include as a TDR priority sending site: " <u>Designated Rural County landmarks and significant Rural archaeological sites.</u> "   | Will amend R-316 to reflect this comment  |
| <b>Stillwell, Paul and Bernadine, P.O. Box 591 (4234 333<sup>rd</sup> Avenue SE), Fall City, WA 98024</b>   |   |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox – above.   | See response to Adcox - above   |
| <b>Stromatt, Scott <a href="mailto:scstromatt@pol.net">scstromatt@pol.net</a>, Sierra Club</b>  |   |
| E-307e: Conservation Efforts--While we applaud the County for a policy to "evaluate the broadest array of projected future climate scenarios," more specifics are needed here to describe what will be evaluated, how it will be evaluated, and how the results will be used to "maximize conservation efforts."<br><br>E-404a & E-404c: Habitat Corridors--Given that the cities can essentially do whatever they want with no collaboration with the County, we remain highly skeptical that the integrity of habitat corridors can be sufficiently maintained. We encourage the County to further partner with cities to take a "global," not "local," perspective towards habitat corridors and migration patterns. | Specifics are needed, but they should be spelled out in individual work plans. Because the Comprehensive Plan is a policy document and only updated every 4 years, details could not be changed except every 4 years.<br><br>We agree and would welcome collaboration on corridor planning. |



**Stromatt, Scott [scstromatt@pol.net](mailto:scstromatt@pol.net), Sierra Club (Continued)**

E-444 & E-446: Wetland "Mitigation"--We remain skeptical of wetland "mitigation" and "replacement." All efforts should be taken to not disturb native wetlands in the first place, so that they do not need to be "replaced" elsewhere.

[first para., p. 4-83] In-Lieu Fee Mitigation--The fee-in-lieu program, most likely well thought out by practitioners in the field, would seem less desirable an approach than on-the-ground wetland mitigation that is concurrent with any impacted wetland and mitigated in the same watershed. This paragraph indicates the County does have a role in wetland mitigation within UGAs. If so, we believe opportunities then exist for the County to facilitate wetland mitigation, for example, in Black Diamond, since the Update states the County will involve itself "when appropriate agreements are in place."

[first & second paras., p. 4-84, 4-85] Mitigation Banking--It is not clear where the watershed priorities are within watersheds impacted or a watershed of the County's choice. Why is there a need for another authorized agent (i.e., "bank sponsor") to substitute for King County?

Policies related to strong critical areas protections remain in place. Also, policies retain the "mitigation sequence," which requires first avoiding and minimizing impacts before allowing compensatory mitigation.

For fee-in-lieu program, all impacts will be mitigated within the same watershed. Mitigation fees from multiple impacts will be pooled to result in larger more meaningful mitigation projects – projects that address known watershed needs.

Timing for mitigation through fee-in-lieu program can vary from advance, to concurrent, or delayed. In no cases will implementation of mitigation occur more than 3-years after the impacts occur.

Program intends to work with any and all willing local jurisdictions.

Some mitigation banks are private, entrepreneurial ventures, and in those cases, an entity other than King County is the bank sponsor. Whether through fee-in-lieu or mitigation bank, all mitigation must occur in same watershed as impacts

Will clarify what is meant by "watershed context" to reflect that mitigation projects address watershed needs and are placed where the projects will have sustainable long-term benefits to aquatic resources in the watershed.



**Stromatt, Scott [scstromatt@pol.net](mailto:scstromatt@pol.net), Sierra Club (Continued)**

[second para., p. 4-86] Mitigation Reserves Program--The third sentence is vague: "Sites and projects through the Mitigation Reserves Program will occur in a watershed context, ensuring projects at protected sites occur in places with importance to ecological integrity of the watershed." Possibly, the meaning of "watershed context" should be better defined and expanded upon.

Concern that Habitat projects are held to higher mitigation standard on Ag lands than when Ag lands are sold for development

Concern that King County ensuring implementation of offsetting adverse actions to agricultural productivity will create a financial and implementation barrier for building of Habitat projects on Ag land

E-201: GHG Reporting--We support County assessing/reporting of energy usage and total greenhouse gas emissions associated government, residences, businesses. We suggest this be done on an annual basis with broad dissemination.

E-202: GHG Standards--The Sierra Club wishes to partner with the County in developing such "transparent standards."

E-205c: GHG Inventory--The County should provide some specifics here such as its partnership with the City of Seattle and Puget Sound Clean Air Agency to develop a GHG measurement model for countywide use.

E-208b: SEPA--We remain very concerned with land-use planning. The County should state that smart land-use planning is an important strategy to achieve many goals, including GHG emissions reductions. Past experience with large "self-contained" master planned developments (MPDs) such as Redmond Ridge, Snoqualmie Ridge, Issaquah Highlands, etc. has shown us that these "communities" are anything but "self-contained," rather they generate an enormous amount of commuters further from major job centers. We testified to this major disconnect during the recent Hearings in Black Diamond associated with Yarrow Bay's proposed MPDs.

Policy R-648 only applies to APD lands which already have limitations regarding development (commenter did not understand other limits on APD lands)

Policy R-648 takes the burden of implementation of offsetting adverse actions to agriculture productivity from the project proponent thus reducing not adding financial and implementation barriers for building of such projects on APD land.

Language was changed to reflect annual reporting of operational energy and emissions and frequent reporting of countywide GHG emissions

King County welcomes the support for this work

Please contact [climate change](#)  
The results of this work will be finalized in February 2012.

King County agrees. The Comprehensive Plan has a multitude of policies directed at encouraging urban development and reducing density in rural areas. See, e.g., U-107 – U-113a.

[@kingcounty.gov](mailto:@kingcounty.gov)

New Fully Contained Communities are not allowed under the current comprehensive plan. See U-174a.

**Stromatt, Scott [scstromatt@pol.net](mailto:scstromatt@pol.net), Sierra Club (Continued)**

E-210a: Collaborative Adaptation--Working with County cities on adaptation strategies is to be commended, but we would also like to see similar efforts on GHG emission reduction and mitigation.

The Black Diamond developments are being permitted by Black Diamond. King County has expressed concerns about certain aspects of the proposals, but it does not have authority to condition the proposals.

See policy E-217c – “King County shall participate in and support partnerships with its cities to increase the effectiveness of local government sustainability and climate change efforts”

E-212b: Impact Assessment--The County should be specific here, e.g., “annually review and evaluate climate change impacts...,” instead of “periodically.”

The Sierra Club supports the Growth Management Planning Council’s concept for Countywide Planning Policies’ Growth Targets to be incorporated into Travel Demand Forecasting. Unfortunately, we are concerned with follow-through and execution of such policies. Such “forecasting” is rendered moot, if the Growth Targets are ignored by jurisdictions. While the new language in this section is generally good, we do not see a focused process by which it can be executed to ensure local jurisdictions do indeed meet, but not exceed their growth targets. This process is part of the “glue” that truly ties together Transportation and Land-Use planning.

This is a good goal but King County has not yet dedicated the resources to do this annually.

The growth targets are not a forecast, neither are they a limit. Instead they are a policy statement of the Growth Management Planning Council expressed in numbers. The targets are established to ensure that King County and its cities can collectively accommodate the state Office of Financial Management’s population forecast. For some jurisdictions, the targets diverge from actual expected growth. King County does not have the authority to control the growth of other jurisdictions nor mandate a new regional process. However, when preparing the travel demand forecast for the King County Comprehensive Plan we do try to incorporate any supplementary information available from cities on their expected growth (for example the city Comprehensive Plan or known large development proposals) into our travel forecast.

**Stromatt, Scott [scstromatt@pol.net](mailto:scstromatt@pol.net), Sierra Club (Continued)**

The Sierra Club supports the Growth Management Planning Council's concept for Countywide Planning Policies' Growth Targets to be incorporated into Travel Demand Forecasting. Unfortunately, we are concerned with follow-through and execution of such policies. Such "forecasting" is rendered moot, if the Growth Targets are ignored by jurisdictions. While the new language in this section is generally good, we do not see a focused process by which it can be executed to ensure local jurisdictions do indeed meet, but not exceed their growth targets. This process is part of the "glue" that truly ties together Transportation and Land-Use planning.

The growth targets are not a forecast, neither are they a limit. Instead they are a policy statement of the Growth Management Planning Council expressed in numbers. The targets are established to ensure that King County and its cities can collectively accommodate the state Office of Financial Management's population forecast. For some jurisdictions, the targets diverge from actual expected growth. King County does not have the authority to control the growth of other jurisdictions nor mandate a new regional process. However, when preparing the travel demand forecast for the King County Comprehensive Plan we do try to incorporate any supplementary information available from cities on their expected growth (for example the city Comprehensive Plan or known large development proposals) into our travel forecast.

We believe there is a great disconnect between the County road network and its interfaces with local jurisdictional networks. While the County can faithfully use the Growth Targets--Travel Forecasts--Transportation Needs process described in the Update, it can all be undermined by what happens within a local jurisdiction that eventually connects to the County road network. Unfortunately, we see no way to resolve such disconnects except through real, concerted coordination with local jurisdictions supported by a strengthened Transportation Concurrency program that allows the County to block local jurisdictional development that will ostensibly use County roads through the unincorporated areas.

Comment noted – see response above re. growth targets and forecasts. King County does not have the authority to deny developments within other jurisdictional boundaries based on transportation concurrency. The County concurrency testing does take into account other jurisdiction traffic on County roads, which can lead to concurrency failure in the unincorporated area.

Suggested wording edits to narrative text regarding climate change and greenhouse gas emissions

Text has been edited.

| <b>Stromatt, Scott <a href="mailto:scstromatt@pol.net">scstromatt@pol.net</a>, Sierra Club (Continued)</b>   |  |
|--|--|
| Three options are identified to meet future transportation needs: (1) Raise more money, (2) Reassess growth; and (3) Reassess LOS. We agree that the first two options are appropriate based on need and priority; however, the third option of "reassess LOS" is akin to lowering the water instead of raising the bridge. We cannot further weaken our transportation infrastructure by simply lowering our standards until they meet current (or future) scenarios. | Comment noted. Reassessing LOS is an option under GMA. King County evaluated its existing transportation levels of service, but did not make any changes to them during this update to the Comprehensive Plan.   |
| The only real long-term, equitable fix for transportation revenue sources is a sustainable user-weighted revenue source, specifically, a vehicle-miles-traveled tax. T-401b commendably mentions "user base funding mechanisms," but provides no specifics.  | King County is working with other agencies, jurisdictions and state and regional decision-makers to establish sustainable transportation funding sources. There are many options and we do not want to limit opportunities.  |
| R-303 Do not remove the reference to Transportation Concurrency for new subdivisions in Rural Areas.   | Comment noted  |
| T-209 By using LOS F for transportation concurrency testing for certain public and educational facilities, those uses would automatically pass. We recommend retaining Rural Area LOS B, or LOS C in special cases.  | This limited provision is provided to allow small development with minor impact to move forward in the development process and to facilitate essential public services. Note that public high schools in the Rural Area must still meet the LOS B standard.  |
| Transportation infrastructure is not required to be online when needed for development already causing the system to fail, and this situation can persist up to 6 years. This time period must be eliminated to be fair and equitable to existing residences and business.   | The six year timeframe is consistent with the Growth Management Act. "Concurrent with the development" is defined by the GMA to mean that any needed "improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years." RCW 36.70A.070(6)(b). |

| <b>Stromatt, Scott <a href="mailto:scstromatt@pol.net">scstromatt@pol.net</a>, Sierra Club (Continued)</b>  |  |
|---|--|
| T-216 Concerned that new development in a passing travel shed will automatically be concurrent. This is not fair and equitable to existing residents and business.  | Any issues with automatic concurrency compliance in travel sheds that pass the concurrency test are offset by annual concurrency testing and update to the concurrency map. All development proposals must still go through the required SEPA and permit review process, which includes additional analysis and potentially mitigation, before approval. |
| T-219 Transfer of Development Rights should not be used to meet transportation concurrency requirements, because the land is subjected to additional impacts from an expanding road network and its environmental impacts.  | The use of TDR to meet concurrency requirements is allowed in the Rural Area of failing travel sheds to enable small scale (four lots or less) residential development. The sending and receiving sites must be in that same travel shed, resulting in no overall net impact to the travel shed.   |
| <b>Swan, Nathan J., 33712 SE 43<sup>rd</sup> Street, Fall City, WA 98024</b>  |  |
| He suggests that the Fall City business district be extended towards Preston, including the law office and others in the business district.   | Many citizens commented that the business district should remain compact. However the law office and two adjacent parcels will be proposed to be added to the business district.   |
| <b>Snow, John S, <a href="mailto:johnsnow@groundsupport.com">johnsnow@groundsupport.com</a></b>   |  |
| <p>There is an active proposal to move the Urban Growth Boundary to allow annexation by the City of Woodinville of a few properties currently on the rural/ag side of the UGB. This is a misguided proposal. The UGB should not be moved.</p> <p>Farmland and rural land, once developed, almost never reverts back to its original state without depopulation. It is unlikely that the Woodinville area will become depopulated any time soon. Encroachment of urban development into the Sammamish Valley will destroy the pleasant and productive environment that currently exists, and will kill the goose that lays the golden Woodinville Wine Country eggs, so to speak.</p> <p>Similar proposals have been made in this area twice before, and have been denied due to conflicts with current land-use law. The third time should not be the charm, and the UGB must remain where it is.</p> | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area  |

# T

|   |   |
|---|---|
| <b>Tanksley, Carolyn, <a href="mailto:ctanksley@comcast.net">ctanksley@comcast.net</a></b>  |   |
| <p>A current proposal to move the Urban Growth Boundary in the Sammamish Valley threatens not only the productive farmlands in the Valley but also the future of the quality of life for our greater Woodinville community.</p> <p>I am writing to urge your support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley. This is in response to ongoing efforts by a group to convince the County to move the UGB and pave the way for an unneeded expansion of the City of Woodinville deeper into the Valley.</p>  | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>  |
| <b>Tanksley, Michael, <a href="mailto:wmtanksley@comcast.net">wmtanksley@comcast.net</a></b>  |   |
| <p>Requests that recent amendments to the King County Code to make home occupations in the rural area more feasible be reviewed to determine if there has been unintended consequences to neighborhoods.</p>  | <p>Comment acknowledged.</p>  |
| <b>Thomas, Claire, President, C-T Management Corp. 13653 Woodinville-Redmond Rd NE Redmond Wa 98052</b>   |   |
| <p>The C-T Management Corporation was incorporated in 1989 for the purpose of promoting and managing farms in the Sammamish Valley. The comments in this letter reflect the opinions of the Board of Directors.</p> <p>We are already seeing the effects of just the <i>possibility</i> of moving the UGB on the prices of farmland. Next to one of our farms is a nice 6 acre tract. It is heavily treed, and would be a excellent place for mushroom and earthworm production, edible shade plant nursery, and any one of a number of other agricultural uses. C-T Corporation was interested in possibly purchasing the property, until the property appraisal came in. It seems the sale of a 5 acre piece of property for nearly \$1,000,000 (coincidentally one of the properties drooled over to be included in "urban growth") has already affected the price of farmland. <b><i>This valuation was included in the comparables in the appraisal, which resulted in this 6 acre parcel being valued at double what it would have been one year ago, even though it is surrounded by Farm Preservation property. This new valuation has effectively put this property out of the reach of any type of farming enterprise.</i></b></p> <p>And there-in lies on of the biggest reasons why this movement of the UGB should not be allowed- the resulting increase in land values and taxes will prohibit any new farming activities in the valley.</p> | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area.</p> |
| <b>Tseng, Vince, 13524 157<sup>th</sup> Court, Redmond WA 98052</b>   |   |
| <p>Opposes the proposal to move the urban Growth Boundary in the Sammamish Valley.</p>  | <p>Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area</p>  |

# U/V

## **Vos, Bob, 18405 SE 394<sup>th</sup> Street, Auburn, WA 98092**

|   |   |
|---|---|
| Requests for ditch maintenance associated with Big Spring Creek project did not materialize | King County has completed Ag Drainage Assistance Project on Big Spring Creek site   |
| Allow strong R-648 language to provide at least a partial level playing field               | New proposed language in R-648 does provide process for a more level playing field particularly relative to offsetting adverse impacts. |

# W

## **Walker, Elizabeth, Councilmember, City of Duvall and Charles Peterson Councilmember, City of Snoqualmie, Co-chairs – Snoqualmie Watershed Forum**

|  |                                       |
|--|---------------------------------------|
| Policy re-write does not meet intent of initiating ordinance                               | New policy R-648 responds to comments |
| Recommend collaborative multi-objective planning process                                   |                                       |
| Support King County's commitment to helping project sponsors offset impacts to agriculture |                                       |
| Encourage flexibility in response to different needs in each basin                         |                                       |

## **Walker, Vicky, 15430 NE 152nd Place, Woodinville, WA 98072**

|  |   |
|--|---|
| A current proposal to move the Urban Growth Boundary in the Sammamish Valley threatens not only the productive farmlands in the Valley but also the future of the quality of life for our greater Woodinville community.   | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area |
| I am writing to express my support for maintaining the current Urban Growth Boundary (UGB) in the Sammamish Valley. This is in response to ongoing efforts by a group to convince the County to move the UGB and pave the way for an unneeded expansion of the City of Woodinville deeper into the Valley. |   |

## **Wagner, Dick, Founder Center for Wooden Boats [harborrat13@yahoo.com](mailto:harborrat13@yahoo.com)**

|   |                       |
|---|-----------------------|
| A careful examination of the Green River environment will find the Pacific Raceways should not have been built where it is and should not be allowed to expand its size and events at its present site. I find the proposed expansion of Pacific Raceways is unethical and unaesthetic to eyes, ears and throats. | Comment acknowledged. |
|---|-----------------------|

|  |  |
|--|--|
| <b>White, Judy and Jonathan, P.O. Box 459, Fall City, WA 98024</b>   |  |
| <p>The change we would like to see to the Plan is simply to remove references to trail route options along the left bank levee easement on the Raging River.</p> <p>Please remove the language from CP-941 referring to the trail options on the left bank of the Raging River...We love our home, the privacy, security and tranquility it provides...We would not barge through other property owners yard or home in Seattle or Bellevue or Woodinville, please help us to maintain our property rights as others are allowed to.</p> | <p>Comment acknowledged. Policy CP-941 makes reference to options for a future trail location. Parks concurs with comment.</p>   |
| <b>Wieting, Michael E., 4554 332<sup>nd</sup> Avenue SE, Fall City, WA 98024</b>   |  |
| <p>All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above</p>  | <p>See response to Adcox - above</p>   |
| <b>Wingard, Greg, <a href="mailto:gwingard@earthlink.net">gwingard@earthlink.net</a></b>   |  |
| <p>My position that the underlying zoning on the Pacific Raceway site is rural, and that uses are strictly limited on this site come from the Soos Creek Area Plan, and an earlier version is what I believe is referred to in the Comp Plan Policy related to Pacific Raceways, CP01014. It doesn't appear to be ambiguous to me.</p>   | <p>Comments acknowledged.</p>  |
| <p>Many of the issues that apply to your analysis to the Soosette Creek would also apply on the southern side of the PACRAC on Soo Creek.</p>  | <p>We are fully aware of this, and when a project permit is submitted, critical area studies will be required and then verified by King County DDES staff. The critical areas will be reviewed under King County Critical Areas Code 21A.24.</p> |



**Wingard, Greg, [gwingard@earthlink.net](mailto:gwingard@earthlink.net) (continued)**

The use of the Sewall Wetland Report does not seem consistent.

We are fully aware of this, and when a project permit is submitted, critical area studies will be required and then verified by King County DDES staff. The critical areas will be reviewed under King County Critical Areas Code 21A.24.

Though The Sewall wetland report has not been field verified by King County staff, it is the only valid wetland information for the presence of wetlands that we have for the east side of the Soosette Creek slope on this property. All other wetland/stream information that was given to us was anecdotal or from undocumented sources. Ed Sewall is on the King County Preferred Wetland Consultant list, so we are confident of his wetland abilities, however we do not know how large an area the study covered and the study is old so some of the wetland codes have changed. As mentioned in the Executive Recommended Area Zoning Study, additional wetland information will be required when a project permit is submitted for review. Current King County Codes (K.C.C.) will be applied and then reviewed and field verified by King County DDES staff. If any wetland buffers exceed the area of the conservation easement, K.C.C.21A.24 standards will apply.

Requesting addition to the Executive Recommended Area Zoning Study “and the requirements of the Critical Areas Ordinance” at the bottom of page 2.

We will add that clarification.

**Wingard, Greg, [gwingard@earthlink.net](mailto:gwingard@earthlink.net) (continued)**

Steep slope setbacks greater than the legal minimum setbacks are necessary for protection of the steep slopes.

K.C.C.21A.24.280.B and K.C.C.21A.24.310B states if a critical area report is not submitted the minimum landslide/steep slope buffer is 50 feet. When a project permit is submitted for this site, a geotechnical report will be required and then reviewed by a King County geologist. The buffers will be set according to the geotechnical report. Steep slope buffers and landslide hazard buffers could be larger or smaller than 50-feet. If the buffers are determined to be larger based on the stability of the slopes and the proposed project then those buffers will be applied to the project. If the geotechnical report determines that slopes are stable enough to reduce the buffers below 50-feet, the buffers will not be able to be reduced in the conservation easement as the 50-foot setback from top of the steep slope and landslide hazard area as the outer edge of the conservation easement in the Executive Recommended Area Zoning Study to protect water quality in Soosette Creek

Requested adding a reference to the section on steep slope/landslide hazard areas would benefit from at least a brief reference to actual slope failures in the immediate area.

Research would be needed to see if the slope failures that occurred have similar site conditions to the project area that the Executive Recommended Area Zoning Study covered. Were these in landslide hazard areas, steep slope areas or both? There is a distinction made between steep slopes and landslide hazard areas. The K.C.C. 21A.24 and the King County Comprehensive Plan recognize this. The known slide that occurred on the site was already referenced in the study under instream habitat paragraph.

|  |   |
|--|---|
| <b>Wingard, Greg, <a href="mailto:gwingard@earthlink.net">gwingard@earthlink.net</a> (continued)</b>   |   |
| Please clarify "if wetlands are hydrological connected with Soosette Creek they would qualify as a wetland complex so it's a fairly foregone conclusion".                          | While wetlands that are hydrologically connected to Soosette Creek may be thought of as a large complex, the use of term wetland complex in the Executive Recommended Area Zoning Study, was meant to refer to the K.C.C. 21A.06.1392 definition of wetland complex. We will add that code reference to the study for clarification |
| The text lists the specific pollutants Soos Creek is water quality limited for, why not for Soosette Creek?  | Fecal coliform has been added to the Soosette Creek section.  |
| <b>Winship, Alice, President, Maritime Folknet, <a href="mailto:walice1@qwest.net">walice1@qwest.net</a></b>   |   |
| Revise the definition of Green Building in the Urban Chapter to include adaptive reuse of historic buildings.  | Great comment – we will look to revise the definition to include adaptive reuse of historic structures. Please note that the text specifically refers to existing structures and also calls on the county to use sustainable development practices in all building the county constructs, remodels, and renovates.                  |
| <b>Wohllaib, Eric, Sofie and Thomas, 3034 364<sup>th</sup> Avenue SE, Fall City, WA 98024</b>  |   |
| All comments relate to the Fall City Subarea Plan update and are the same as the comments submitted by Adcox - above   | See response to Adcox - above   |
| <b>Whelan, Annette, <a href="mailto:annettewhe1@gmail.com">annettewhe1@gmail.com</a></b>   |   |
| Opposes the proposal to move the urban Growth Boundary in the Sammamish Valley.  | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area   |
| <b>West, J.B., <a href="mailto:jbwest@acm.org">jbwest@acm.org</a></b>  |   |
| There is NO NEED to change the UGB. Woodinville already has a large, unfinished wine district overlay property in the valley that has been sitting idle for years. NO MORE SPRAWL! | Comment supports the recommendation of the Sammamish Valley subarea plan to deny the UGA expansion in this area   |

# Y/Z

| <b>Zapel Sr., Ed, 29404 SE 180<sup>th</sup>, Hobart, WA 98025</b>  |  |
|--|--|
| Taylor Mt Forest Rezone: Objects/Does not support. Does not agree that this action would benefit land management. Asks who requested rezone. | This rezone is a technical change to be consistent with site funding source and Forest Legacy Easement on the site. There is no proposed rezone of private in holding. King County initiated the proposed land use and zoning changes. Other comments noted. |